

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF OREGON

3	SUZANNE IVIE,)	
)	
4	Plaintiff,)	3:19-cv-01657-JR
)	
5	vs.)	June 17, 2021
)	
6	ASTRAZENECA PHARMACEUTICALS, LP,)	Portland, Oregon
)	
7	Defendant.)	

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10 (Jury Trial - Volume 4)

11 BEFORE THE HONORABLE JOLIE A. RUSSO

12 UNITED STATES DISTRICT COURT MAGISTRATE

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INDEX

1	Witnesses: (For the plaintiff)	Direct	Cross	ReD	ReX
2					
3	Suzanne Ivie	538	602	713	717
4					
5	Barbara McCullough	619/649	643/702		
6	Cheryl Johnson	691	695		
7	Jenny Capell	699			
8	Judy Gibb	718			
9	Dawn Benson	723	728		
10	Scott Severt	730	740	752	754
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					

1 (June 17, 2021)

2 P R O C E E D I N G S

3 (Open court; jury not present:)

4 THE COURT: Good morning. It is 8:15. I would like
5 to get started. There are three issues. It would be great to
6 be finished a couple of minutes before 9:00 so we can take a
7 break.

8 MR. OSWALD: I think we are down to two, Your Honor.

9 THE COURT: That is wonderful. Thank you.

10 MR. OSWALD: If you remember, yesterday we raised the
11 issue at the conclusion of court was how the issue of the
12 amount of lost pay and benefits would be dealt with from the
13 point of trial through the point of retirement, or some point
14 there, in essence after trial, and what is commonly referred to
15 in certain employment statutes as front pay.

16 The issue was, in light of the fact under the Oregon
17 statute, all lost pay and benefits is in fact a legal remedy
18 and goes to the jury, and so what do we do about the situation
19 where under a statute like the ADEA, which defines it as a
20 substitute for reinstatement for, in essence, front pay?

21 So I proffered to the Court that the Ninth Circuit
22 says that is an issue for the jury once the Court determines
23 that in fact reestimate is impracticable. So I suggest that he
24 would allow the jury to then give an advisory verdict on the
25 whole thing, because then it makes sense. The Court can then,

1 if it is a verdict just on the ADEA, if the Court determines
2 that reinstatement isn't practicable, the front pay award at
3 that point. If the jury awards on all the claims, then, of
4 course, both would go pursuant to the Oregon whistleblower
5 statute.

6 So what we have agreed to is that it is
7 appropriate -- what we discussed yesterday is that we would
8 allow evidence of both front pay and back pay to go to the
9 jury. Then on the verdict form -- so the evidence then, just
10 to preview it, we will -- with Dr. Edelman, who does the
11 calculation as the economist, he will give the full figure.
12 Then he will break it down into front pay and back pay
13 components.

14 Then what would make sense on the verdict form, we
15 would ask the jury -- say, "Look, these are the total damages.
16 We would ask you to break it out, to the extent you find
17 liability on these claims, into back pay and front pay." Then
18 that would be very easy for the Court to parse out. If, for
19 example, the jury finds liability on certain of the claims, but
20 not other of the claims, then it would be very easy to assign
21 damages. Then the Court would then play the role of
22 determining if reinstatement were practicable -- everything
23 other than the Oregon whistleblower statute, where it's legal,
24 and therefore for the jury to make that determination.

25 So that's what we agreed to. We will call

1 Scott Severt and then Dr. Edelman, who will present the full
2 damages. Then we will break it up into two separate tables.
3 We will enter those into evidence. That's what the jury will
4 have. Then we will ask for those two items on the verdict
5 form -- one for back pay; one for front pay. Then, of course,
6 emotional distress would be on certain of the claims.

7 THE COURT: Wonderful. That was my inclination as
8 well after researching last night. So thank you. It made it
9 much easier. I appreciate that.

10 MR. McCARTHY: Judge, one other piece of good news.
11 I think we actually resolved one of the other two. I will give
12 you the bad news second, which is there may be another small
13 issue related to an exhibit that we need to raise and related
14 concerns.

15 Would you like us to address the issue -- let me
16 first tell you how we resolved the third issue. I thank
17 plaintiff's counsel for providing some additional information
18 last night about the timing of expected witnesses of the three
19 friends of Ms. Ivie and Ms. Ivie's own testimony. So we are
20 going to withdraw our objection to Ms. Gibbs, Ms. Capell, and
21 Ms. Benson. So we believe that issue is resolved.

22 As I mentioned, I know Your Honor wants to minimize
23 sidebars during trial for the convenience of the jury.

24 THE COURT: Yes.

25 MR. McCARTHY: So we do want to raise one concern

1 related to the admission of certain exhibits. If it is okay
2 with you, I will just start with the AstraZeneca witnesses and
3 Mr. Oswald's renewal of his objection, I guess, to certain of
4 those witnesses, if that makes sense, Your Honor.

5 THE COURT: Thank you.

6 MR. MCCARTHY: Again, I know Your Honor wants to hear
7 detail about what these witnesses will cover. I just wanted to
8 start with a little context for Your Honor as to why we are
9 calling multiple witnesses, and the board here shows you the
10 names and some photos to sort of put it in context. Now, these
11 are a mix of district sales managers and sales professionals,
12 so sales reps. The two gentlemen at the bottom, Mr. Stickle
13 and Mr. Barnes, are sales reps who have not served as district
14 sales managers. Mr. Thomsen, Mr. Griffith, and Ms. Hamilton
15 are employees who have been district sales managers and sales
16 reps. Mr. Thomsen and Mr. Griffith are DSMS who formerly
17 reported to Ms. Ivie as sales reps and are now DSMS.
18 Ms. Hamilton is a DSM who has not reported to Ms. Ivie but who
19 has reported to Ms. DiNunzio and has been subject to the same
20 requirements and instructions.

21 Now, just to answer a threshold question as to why we
22 want to call multiple witnesses, Your Honor, it's because we
23 know that the plaintiff's burden is to demonstrate pretext, and
24 we know from opening and the lines of questioning that we have
25 seen that one of the things that plaintiff wants to tell the

1 jurors is that this -- what we contend is the key job
2 requirement of coaching, the 80/20 requirement that we contend
3 is the basis of the termination. Their case to the jury, we
4 believe, is going to be that is a pretext. It is an excuse.
5 It is not a real requirement. It was not consistently enforced
6 and, frankly, just was not very important.

7 So that's what these folks are going to talk about,
8 because the DSMs all were subject to the same rules from
9 Ms. DiNunzio and the company. They coached a number of sales
10 reps, and the sales reps also received coaching, and so the
11 sales reps are going to talk about why that in-person coaching
12 is important.

13 I'll get into it in a minute how these witnesses are
14 different from each other. But I would say, Your Honor,
15 respectfully, in the context of a pretext issue, the concern
16 about cumulative testimony is somewhat misplaced, because the
17 plaintiff's whole point is she is singled out. So we need to
18 put on multiple witnesses to put on a compelling case that she
19 was not singled out.

20 I think today there is going to be questioning and
21 argument -- or argument in closing that at the time the
22 plaintiff was terminated, the company was aware that this
23 requirement wasn't being consistently enforced and that it
24 wasn't a significant job requirement. So that's what we are
25 trying to rebut with these witnesses, Judge.

1 Unless Your Honor has questions on those threshold
2 points, I can jump into how these witnesses are different from
3 each other

4 THE COURT: No questions. Thank you.

5 MR. MCCARTHY: I will say -- and we have informed
6 plaintiff's counsel of this. We are willing to drop one of
7 these witnesses in the interest of moving things along and
8 preserving time. We would like to hear the end of plaintiff's
9 case before we decide which one, but we are willing, in the
10 interest of compromise, to drop one of them.

11 THE COURT: Okay.

12 MR. MCCARTHY: So just getting into who these
13 witnesses are, Mr. Thomsen, as I understand from Mr. Oswald,
14 there is not an objection to Mr. Thomsen testifying.

15 Ms. Hamilton, a colleague of Ms. Ivie, was a DSM
16 colleague, not a subordinate of Ms. Ivie. She had a
17 different geography. She is in the Colorado area but had to
18 comply with the same coaching requirements at the exact same
19 time as Ms. Ivie, the same instructions from Ms. DiNunzio,
20 which, again, is directly responsive to plaintiff's allegation
21 that the coaching policy was pretext.

22 She is also alleged to have been in meetings with
23 Ms. DiNunzio that discussed off-label promotion. She was
24 interviewed in the HR and compliance investigations. She is
25 alleged to have made fun of Ms. Ivie around the age and

1 Pat Benatar name. There was evidence yesterday that Ms. Ivie
2 alleged that Ms. Hamilton breached privacy rules by circulating
3 a picture of a prescription bottle. So those are the basics on
4 Ms. Hamilton.

5 I will go to the other DSM next, and that's
6 Mr. Griffith. Mr. Griffith reported to Ms. DiNunzio during the
7 time when the DSM coaching requirements were in effect, and so
8 he was subject to them as well. He also, unlike Ms. Hamilton,
9 previously reported to Ms. Ivie as a sales rep. So he will
10 testify to Ms. Ivie's coaching of him as well as his
11 understanding of how the DSM requirements applied to him in his
12 role as a DSM in a subsequent time period

13 Mr. Griffith, as Your Honor may recall from the
14 testimony yesterday, he has also been accused of a variety of
15 things by Ms. Ivie and Ms. Truax related to off-label
16 promotion, and we believe we are entitled to put him on to
17 rebut those allegations. We also expect Ms. Ivie to allege
18 that Mr. Griffith was not qualified to be in the DSM role
19 because he's younger -- not because he is younger -- he was not
20 qualified and that he received the DSM role, because he is
21 younger and not older.

22 Your Honor, I would like to go now to the two sales
23 representatives who are on the bottom of the chart, Mr. Barnes
24 and Mr. Stickle. Mr. Barnes reported to Ms. Ivie as a sales
25 rep from 2010 to 2014 and 2016 to 2017. He has had a long

1 career with AstraZeneca. He has reported to multiple other
2 managers. So he has observed Ms. Ivie and other managers'
3 behaviors, and those managers were subject to the same DSM
4 coaching rules that applied here, so he can explain how the
5 managers' behavior around coaching affects and helps sales
6 reps.

7 He is going to talk specifically about his experience
8 with Ms. Ivie, the types of written feedback that she provided
9 specifically by comparison to feedback he has gotten from
10 another DSM. There is an exhibit on this. He is going to
11 explain to the jury that actually shows the other DSM giving
12 him specific feedback on interactions in person with healthcare
13 providers; and by contrast, Ms. Ivie's feedback, which does not
14 reflect in-person interaction. So it is going to help
15 illustrate for the jury how those approaches differ.

16 Again, this goes to the plaintiff's claim that
17 coaching -- that the 80/20 split was not a real job requirement
18 and also critically that virtual coaching is sufficient for the
19 job, and we believe this witness will explain to the jury why
20 it is not.

21 Finally, Mr. Stickle, last, Your Honor, reported to
22 Ms. Ivie for almost ten years. He is almost 70 years old,
23 which we think is important in the context of Ms. Ivie's age
24 discrimination claim. He had a poor year. Ms. Ivie did not
25 help him come up with a coaching plan to help turn it around.

1 She did not increase her live coaching with him. When she did
2 see him in person, it was usually just for breakfast or lunch,
3 and she wouldn't go on a sales call with him.

4 Importantly, Your Honor, Mr. Stickle now reports to
5 Chris Thomsen, who is now in the same DSM role that Ms. Ivie
6 was in. So he can testify about the coaching that has been
7 given to him in the time since he has been reporting to
8 Mr. Thomsen, and Mr. Thomsen coaches him in the field for one
9 or two full days per month in person in compliance with the AZ
10 coaching requirement. Mr. Stickle, who, again, is almost 70
11 and has had a long career, is going to say that his
12 performance, which was suffering under Ms. Ivie, turned around
13 under Mr. Thomsen, because, again, he feels that he has gotten
14 more feedback, more constructive criticism on his selling
15 skills under Mr. Thomsen.

16 Thank you, Your Honor.

17 THE COURT: Mr. Oswald, I understand there will be no
18 objection to Chris Thomsen, and I understand that defendant is
19 willing to drop one of the remaining four. Could you speak to
20 the remaining four, please.

21 MS. CHAMBERS: Your Honor, I'll respond to that.

22 THE COURT: I apologize.

23 MS. CHAMBERS: No problem.

24 So just four points, Your Honor. First, all of these
25 witnesses, none of them were involved in the decision to

1 terminate Ms. Ivie. We are here to determine if the
2 termination was legal or if it was based on an illegal reason,
3 like age discrimination or for whistleblowing.
4 Stephani DiNunzio testified yesterday that the only person she
5 talked to briefly before the termination decision was
6 Chris Thomsen, and so for that reason we are not objecting to
7 Chris Thomsen.

8 None of these other witnesses were involved at all
9 with the termination decision. AstraZeneca has already put
10 forward its witnesses who were involved in the termination
11 decision these last few days, and they testified about what
12 went into the decision and what they considered.

13 Second, what Mr. McCarthy just described is pure
14 character evidence, and that should be excluded under Rule 404.
15 What AstraZeneca is trying to do is cherrypick certain years
16 from Ms. Ivie's 19-year career and certain subordinates that
17 reported to her and have them testify that she didn't coach in
18 a certain way or in a certain manner to imply that
19 Stephani DiNunzio's decision now in 2019 was justified. That
20 is character evidence and should be excluded.

21 Third, this is going to result in mini-trials.
22 Mr. McCarthy just talked about a whole array of issues that are
23 not at all relevant in this case. I think this boils down to a
24 misunderstanding. The issue here is not whether or not -- the
25 quality of Ms. Ivie's coaching, or if she did 80 percent

1 virtual coaching. Throughout the case, and in her deposition,
2 she admitted that she did not do 80 percent coaching.
3 AstraZeneca said it in its opening statement, and Ms. DiNunzio
4 testified about that as well. This is not an issue in dispute,
5 and it doesn't need four witnesses to testify about that.

6 As an example of the evidence that would need to come
7 in, for example, Mr. McCarthy talked about Genie Hamilton and
8 how she complied with the 80/20 rule. Well, we don't know
9 that. We have no documents in evidence about the 80/20 rule as
10 it relates to Genie Hamilton. We haven't seen her field
11 coaching reports. We didn't ask Ms. DiNunzio about
12 Genie Hamilton's 80/20 compliance.

13 Also, there is talks about Chris Thomsen's
14 performance as a DSM after Ms. Ivie left. That's a whole other
15 issue. It would require more documents and more testimony.

16 There is discussion about Stickle and Thomsen's
17 relationship as an employee and manager after Ms. Ivie left.
18 Again, that is a whole other mini trial of issues. This all
19 goes to my final point of Rule 403. All of this evidence hits
20 on everything that 403 wishes to exclude, which is cumulative
21 evidence, evidence that is going to confuse the jury about what
22 are the actual issues in this case, and just a waste of the
23 Court's time.

24 So for those reasons, we would like to renew our
25 motion on Griffith, Stickle, Hamilton, and Barnes.

1 THE COURT: Thank you, Ms. Chambers.
2 Response.

3 MR. McCARTHY: Very briefly, Your Honor. First, it
4 is not character evidence. I don't intend to elicit any
5 opinion from any of these witnesses about Ms. Ivie's character.
6 What they're going to describe are personal, first-hand
7 observations of what they saw, what they heard from
8 Ms. DiNunzio, from Ms. Ivie, how often they saw Ms. Ivie, the
9 types of interactions they had with Ms. Ivie.

10 With respect to relevance generally, Your Honor, the
11 issue and the argument that, again, we believe that Ms. Ivie is
12 going to testify to and that the jury is going to hear is that
13 Ms. Ivie believed that the 80/20 policy was just a
14 recommendation, not a requirement. They're going to argue to
15 the jury that it was not consistently enforced, which we
16 disagree with. They are going to argue to the jury that it is
17 not a good enough reason to terminate Ms. Ivie.

18 So in light of all that and in light of the fact it
19 is a pretext argument, we think it is appropriate to have
20 multiple witnesses who were subject to the same requirements
21 testify about these matters. Again, in the face of Ms. Ivie's
22 testimony that she had a different understanding; that she
23 reported to the same supervisor and was in the same area as
24 each of these witnesses.

25 With respect to the testimony about the

1 individualized incidents and Mr. Thomsen coaching after
2 Ms. Ivie departed, the jury will want to hear about this. The
3 issue is: Is this coaching requirement important? Is it
4 relevant to AstraZeneca's business? Is it something that helps
5 these sales reps do their work?

6 I will also say the majority of these witnesses were
7 deposed in discovery. Counsel has had an opportunity to
8 examine them and to request documents regarding them. First of
9 all, I disagree that we are going to have mini trials. That's
10 not our intent. These witnesses should be brief from our end.
11 Again, to the extent that plaintiff wanted to explore issues
12 with these witnesses, they have had an opportunity to do so.

13 THE COURT: Thank you.

14 MS. CHAMBERS: One final point, Your Honor. Again,
15 the issue that Mr. McCarthy is raising is about Ms. Ivie's
16 coaching and the quality of her coaching in the prior 19 years.
17 Ms. DiNunzio, Dawn Ceaser, and Karen Belknap, they were the
18 decision-makers. We saw the documentation they reviewed and
19 what they relied on, who they spoke to, and that was none of
20 these people that defense counsel is wishing to present to the
21 jury.

22 The jury has already heard what has gone into the
23 termination decision. The decision is simply whether or not
24 what the defendant has offered the jury believes is the real
25 reason for the termination or if it was something else. To go

1 into what certain subordinates thought or felt at select years
2 in her 19-year career is just misleading and completely
3 irrelevant.

4 MR. MCCARTHY: Your Honor, I promise this will be
5 short. Again, the problem is the plaintiff is going to make
6 argument broader than the reasons that the witnesses who are
7 involved in the termination had stated. The whole point is,
8 they are going to argue to the jury that, despite whatever
9 Stephani DiNunzio looked into, this was pretext, because it
10 just wasn't a real requirement, right. So the fact that
11 Stephani didn't talk to folks other than Chris Thomsen is
12 beside the point, because they are going to argue to the jury
13 that this was a fake requirement, right, and so we are entitled
14 to rebut that. Because it is a pretext case, we are entitled
15 to demonstrate that both it is a real meaningful critical
16 requirement for AstraZeneca and that the plaintiff was not
17 singled out.

18 Thank you.

19 THE COURT: Thank you.

20 I'm going to affirm my prior ruling and deny
21 plaintiff's renewed motion in limine. I find these witnesses
22 relevant as to the pretext issue, pursuant to 401. I don't
23 find undue prejudice or risk of mini trials under 403. First
24 of all, I'm counting on defendant to drop one of the five. I
25 will watch closely for redundancy and expect counsel to move

1 this testimony along. Counsel said on the record, from their
2 end, this is going to be brief. I will also watch for anything
3 going into character evidence and cut them off immediately.

4 MR. McCARTHY: Understood.

5 THE COURT: Thank you. You said you had an issue on
6 an exhibit.

7 MR. McCARTHY: Sure, Your Honor. This arose last
8 evening, and I'll give you a brief background as to the reason
9 why we are raising it.

10 The plaintiff initially intended to call two
11 healthcare providers to testify at trial. One of those who is
12 testifying, Dr. Johnson, is a primary care physician. The
13 other witness, who had been on the plaintiff's witness list, is
14 Dr. Byrne. Dr. Byrne is a migraine specialist. We understand
15 that Dr. Byrne is not coming to trial, so she is not going to
16 testify at trial.

17 Among the exhibits we objected to, Your Honor, on the
18 plaintiff's exhibits list prior to the pretrial conference is
19 Exhibit PX128. PX128, we believe, is from the medical records
20 of Dr. Byrne, the migraine specialist, and we objected to that
21 exhibit because it is hearsay, because it's not authenticated.
22 But we also -- I'm not going to speculate, Your Honor, but the
23 Court may have also been proceeding under the assumption that
24 Dr. Byrne was going to be called as a witness at trial.

25 We raise it with respect to this exhibit. I also

1 think it raises sort of a procedural but maybe a substantive
2 question, Judge, about whether exhibits that have not been
3 shown to a witness are in evidence. My understanding, Judge,
4 with respect to PX128, is that plaintiff believes they can show
5 that to the jurors; for example, in closing. We are extremely
6 concerned about that. I will tell you that PX128 -- I know
7 Your Honor may have a copy of that. It is a hearsay statement
8 from the plaintiff's husband, who is not a witness at trial,
9 containing speculation about plaintiff's medical condition. It
10 is highly prejudicial. It is also not relevant because
11 plaintiff's husband is not a medical professional and because
12 there is going to be no foundation testimony or authentication
13 by Dr. Byrne, because she is not coming to trial. There is
14 going to be no evidence that that statement was considered as
15 part of medical treatment; that it is any part of the
16 plaintiff's medical record or it is in any way relevant.

17 So I raise it specifically with respect to that
18 issue, because I don't want to interrupt testimony or argument,
19 Your Honor, out of respect for the jury and for you, for the
20 Court, but it also, again, raises a broader concern if the
21 plaintiff is going to put into evidence -- or if the
22 plaintiff's position is that everything that Your Honor has
23 admitted, even if not shown to a witness, is in evidence, we
24 are concerned that we are going to have a bunch of disputes,
25 particularly during closing, without clarification, as to

1 whether all of the exhibits can be shown to the jury, even if
2 they haven't come in through a witness.

3 I raise it with respect to PX128, because it is a
4 very huge concern, but I think it may apply more broadly. So
5 I'm asking you for a ruling -- I guess I'm renewing our
6 objection specifically to PX128 and the other exhibits that are
7 part of Dr. Byrne's medical file on the basis that she is not
8 testifying and, again, reasserting our objections to those.

9 But we also wanted to raise with Your Honor our
10 broader concern about exhibits that have not been authenticated
11 and have not been provided any foundation by the witness being
12 shown to the jury.

13 Thank you.

14 THE COURT: Thank you.

15 MR. OSWALD: Your Honor, let's just put aside 128 for
16 a minute and then deal with the rest. This is terribly late
17 and inconsistent with the Court's order. The Court's order was
18 very clear on June 7th. It says here, "All exhibits not
19 objected to are deemed admitted and received in evidence."
20 These documents are already in evidence. The documents are, as
21 you know, what we relied upon at the pretrial. Mr. McCarthy
22 read out on the record during the pretrial certain exhibits
23 that he remained had objections to; others that he did not have
24 objections to. Those that he did not have objections to are
25 now in evidence. We relied upon that. We relied upon the

1 Court's order of the 7th in proceeding with our witnesses to
2 date.

3 I have a list of all of the evidence that he did not
4 object to during the pretrial, and the Court, on the 7th,
5 entered an order indicating that they are already in evidence,
6 and we relied upon that. The Court then entered an additional
7 order on a number of other exhibits overruling the defendant's
8 remaining objections, indicating those are deemed admitted into
9 evidence. They are already in evidence. It is on the record.
10 The Court has entered that order, and we relied upon that
11 order.

12 Now, to change -- I think that's it. I don't see
13 that there is really any other discussion. What the defendant
14 is now saying is that your order saying that the exhibits are
15 in evidence really doesn't mean that they are in evidence; that
16 somehow there is an additional requirement. Certainly that's
17 not what the Court's order said. It is not what the rules say,
18 and it is not what we relied upon.

19 On Sunday night, before we called our first witness,
20 we sent over a list of all of these exhibits to Mr. McCarthy
21 and said to him, "Mr. McCarthy, are we right?" Just like I
22 sent the email on the 17th of May, I wanted to make sure that
23 there was no misunderstanding. "We understand you have waived
24 your objections to these certain exhibits on the record at the
25 pretrial. The Court has entered an order indicating that they

1 are admitted." Then we have the Court's order. "Am I right
2 that all of these are in evidence?" That was on Sunday before
3 we call our first witness. Not a peep from defendant.

4 When do we get this? Last night, after we have
5 called all of our witnesses. Now they raise this issue to the
6 Court, in this, right here, to say, "Oh, well, if you didn't
7 show it to a witness, it is not in evidence." It is
8 inconsistent with the order. There is terrible prejudice
9 involved, in light of the fact we have been dealing in good
10 faith. I'm, frankly, surprised that this has come up at this
11 point. They are making this argument, in light of the Court's
12 clear order and in light of their representations at the
13 pretrial. I'm surprised.

14 These exhibits are in evidence. I have a list. I
15 have a list of what remain. They are in green. And I have a
16 list you then entered an order overruling objections. Those
17 are in blue. Those are now in evidence in this case, and we
18 relied upon them up to this point in going through
19 three-quarters of our case-in-chief.

20 THE COURT: Thank you, sir.

21 MR. MCCARTHY: Just to clarify, with respect to the
22 exhibit that I started with, PX128, that is one of the exhibits
23 we objected to at the pretrial. That's not one of the
24 objections we withdrew at the pretrial.

25 I think, Your Honor, we are certainly aware of the

1 Court's prior orders on this. Our reason for raising it is
2 because we have seen that the Court has been tracking --
3 keeping track of what exhibits are being received into evidence
4 as they come in. We are asking for clarification as to the
5 Court's view of this. We certainly respect your prior order
6 and will comply with whatever your order is. We wanted to
7 raise it because we think it's important to have clarification
8 so that we don't need to interrupt trial with disputes like
9 this, Your Honor.

10 THE COURT: Thank you.

11 MR. OSWALD: At the end of every day I go to the
12 clerk. We hadn't done it -- we even went on Sunday just to
13 confirm everybody's understanding what your order was. Not a
14 peep. We are now on Thursday. And this is being raised now?
15 I don't understand.

16 THE COURT: Mr. Oswald, will you speak specifically
17 to defendant's renewal of its objection to Exhibit 128 as well.

18 MR. OSWALD: Yes, I will speak to that.

19 Well, here is the thing: Mr. McCarthy is correct.
20 The Court overruled the objection to 128. That's now in
21 evidence. It is in your order. And this is your order on the
22 7th of June. Here is what it says -- it says, "Defendant's
23 objections to plaintiff's exhibits are overruled as to the
24 following exhibits." It begins with 1, 11, 20, 36, 58, 64, 88,
25 97, 98, 103, 105, 107, and 127 through 133. It's in evidence.

1 It is already in evidence. So my response is that it is in
2 evidence. I understand that the defendant may find that the
3 evidence is prejudicial. I get that. That's what evidence
4 sometimes is, it is sometimes prejudicial, but it is in
5 evidence. The Court has ruled on that point. We relied upon
6 it.

7 MR. MCCARTHY: Your Honor, just very briefly. Again,
8 just as it is appropriate, and just as Mr. Oswald did this
9 morning, he renewed a motion in limine as to Your Honor's
10 pretrial rulings, although we certainly have seen them and
11 understand they are essentially in limine. We don't see a
12 reason why we can't renew an objection under the changed
13 circumstances that now exist, which is the doctor who was
14 intended at the time we made our objections and Your Honor made
15 rulings to provide foundation, authentication, and relevance to
16 that exhibit is no longer coming to trial. Again, it is highly
17 prejudicial and not relevant and certainly under Rule 403
18 should also be excluded for those reasons.

19 Thank you, Your Honor.

20 MR. OSWALD: Your Honor, we're not offering it -- we
21 are offering it for the following purpose: Ms. Belknap stated
22 on the stand that employees go out on leave because they are
23 being disciplined. They get a discipline, and they go out on
24 leave. The implication was they make up a reason. They make
25 up some sort of condition as the reason to go out on leave.

1 This letter predates all of that. It's in February before she
2 is on -- she is issued the discipline on the 1st, before she is
3 even aware of the discipline on the 25th of February.

4 So it is offered to prove the fact that she
5 suffered -- this was a migraine, and she had migraines even
6 before she went on leave. The fact that she went out on leave
7 was not because she was trying to make up a reason, but rather
8 that she had migraines. That's all we are going to offer it
9 for, and I'm happy to have a limiting instruction for that
10 purpose, if the Court wants. That's why we are offering the
11 evidence. It is offered to prove only that she suffered
12 migraines prior to the date on which she was notified of the
13 discipline. That's it.

14 MR. MCCARTHY: Your Honor, just to respond to that,
15 because that was a new point. It is going to be undisputed
16 that Ms. Ivie has suffered from migraines for a long time,
17 since way before she reported to Ms. DiNunzio or had any of
18 these issues. So we would concede that. We are not disputing
19 that she suffered from migraines for a long time. And Ms. Ivie
20 is allowed to testify that she was being treated for migraines;
21 that her migraines increased in severity, whatever she would
22 like to say about the timing of that, and we are not going to
23 object to that testimony, because it is not objectionable.
24 This document is objectionable, for all the reasons I've
25 stated, and so we respectfully request it be excluded

1 from evidence.

2 MR. OSWALD: Your Honor, I will tell you what. I
3 have a way going forward, I think. Let us see if opposing
4 counsel and I -- I take him at his word on that -- let's see if
5 we can come up with a stipulation, because you understand my
6 concern. My concern is we have an HR professional that's
7 involved in the decision here saying that Suzanne Ivie goes out
8 on leave, and then she doesn't take care of any of her
9 responsibilities here, because she knows she is under the gun,
10 and she is going to be disciplined. If we can agree on exactly
11 what he said, which is that she suffered from migraines for a
12 long time; that they are consistent with what he has just
13 described; that they predate any discipline, then I think we
14 may have something.

15 So what I would say is I will not reference
16 Exhibit 128 until at least tomorrow. Mr. McCarthy and I will
17 see if we can come up with a stipulation this evening that will
18 resolve the issue and then see if we can come up with something
19 that works for everyone that is mutually satisfactory. If you
20 defer your ruling on 128, I will commit we won't bring it up
21 today. Then we will bring this issue back to you tomorrow with
22 either some good news, where we've come up with a stipulation
23 we can read to the jury, or then you can rule.

24 MR. MCCARTHY: Respectfully, Your Honor, we are
25 always happy to confer and conserve the Court's resources. I

1 don't think it is a close question, so we would just ask for a
2 ruling to, frankly, not need to engage in this back and forth
3 with respect to this exhibit. But certainly if Your Honor
4 prefers, we are happy to proceed the way Mr. Oswald has
5 requested.

6 THE COURT: I certainly always prefer that the
7 parties get together and work out a stipulation. I will go
8 that route, although I am inclined to grant your renewed motion
9 to disallow Exhibit 128, although I think it is appropriate
10 that the parties figure out a stipulation that indicates that
11 Ms. Ivie suffered from migraines pre her termination date.
12 That would be helpful to the jury, I think.

13 MR. MCCARTHY: Understood, Your Honor.

14 THE COURT: Anything in addition this morning?

15 MR. OSWALD: Your Honor, the larger issue, which is
16 the first issue, which is we think that your order -- we took
17 your order at face value that the remaining exhibits -- and I'm
18 happy to read them off -- are in evidence, consistent with your
19 previous order on the 7th of June and Mr. McCarthy's
20 representation at the pretrial. Exhibit 128, notwithstanding,
21 I believe those are in evidence, and I would like to confirm on
22 the record with the clerk that those are in fact reflected on
23 the exhibit list as admitted.

24 THE COURT: I want to confer with the clerk
25 privately, and then I will let you know immediately. So give

1 me five minutes or so.

2 MR. OSWALD: Understood.

3 THE COURT: Court is in recess.

4 MR. OSWALD: Your Honor, may I pass this up so you
5 know what we are talking about?

6 THE COURT: Certainly.

7 (Recess.)

8 (Open court; jury not present:)

9 THE COURT: Apologies for the delay. Sorry. The
10 exhibits that were received pretrial admitted and received
11 continue to be received, unless defendant can come forward with
12 some truly extenuating circumstance; otherwise the pretrial
13 ruling stands.

14 Mr. Magnuson, will you get the jury, please.

15 MR. OSWALD: Your Honor, I appreciate that. May I
16 preview one before you bring the jury in? Is it the Court's
17 practice to have an exhibit list and then to indicate -- just
18 because this will go on the record -- which are the exhibits
19 checked off as an example that have been admitted into
20 evidence?

21 THE COURT: We were just discussing how to do that to
22 make certain the jury gets the appropriate exhibit. Yes, I
23 think that is the plan.

24 MR. OSWALD: Okay.

25 THE COURT: Both counsel will take a look/sign off.

1 MR. OSWALD: What I'm hearing from you is that --

2 THE COURT: He is really more of the expert.

3 MR. OSWALD: In a year, memories will fade on this,
4 and I just want to be crystal clear. As I understand it, what
5 is admitted into evidence, based on what I submitted were
6 the ones that are in green: Exhibits 5, 6, 7, 8, 9, 10, 11,
7 consistent with your ruling overruling the motion in limine;
8 12, 13, 14, 15, 16, 17, 18, 19, 20, consistent with your ruling
9 on the motion in limine; 21, 22, 23, 24, 25, 26, 27, 28, 29,
10 30, 31, 32, 33, 34, 35, 36; consistent with your ruling on
11 overruling the motion in limine from the defendant; 38, 39, 40,
12 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57,
13 58, consistent with your ruling overruling the motion in
14 limine; 60, 61, 62, 63, 64, consistent with your ruling
15 overruling the motion in limine; 65, 66, 67, 68, 69, 70, 71,
16 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87,
17 88, consistent with your ruling overruling the motion in
18 limine; 89, 90, 91, 92, 93, 94, 95, 96, 97, consistent with
19 your ruling overruling the motion in limine; 98, consistent
20 with your ruling overruling the motion in limine; 99, 100, 101,
21 102, 103, consistent with your ruling overruling the motion in
22 limine; 104, 105, consistent with your ruling overruling the
23 motion in limine; 106, 107, consistent with your ruling
24 overruling the motion in limine; 108, 110, 111, 112, 113, 114,
25 115, 116, 117, 118, 119, 120, 121, 122, 123, 125, 126, and 127.

1 You are reserving on 128, Your Honor, so I'm skipping over 128.
2 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140,
3 141, 142, 143, 144, consistent with your ruling overruling the
4 motion in limine; 45, consistent with your ruling overruling
5 the motion in limine; 46, consistent with your ruling
6 overruling the motion in limine; 147, 150, consistent with your
7 ruling overruling the motion in limine; 151, consistent with
8 your ruling overruling the motion in limine; 152 on the same
9 basis; 153 on the same basis; 154 on the same basis; 155 on the
10 same basis; 156 on the same basis; 157 on the same basis; 158,
11 159, 160, 162, 163, 164, based on your ruling overruling the
12 motion in limine; 165, 166, 167, overruling on the motion in
13 limine; 168 on the same basis; 169 on the same basis; 170; 171,
14 overruling the motion in limine; 172 on the same basis; 173 on
15 the same basis; 174 on the same basis; 175 on the same basis;
16 176 on the same basis; 177; 178, based on your ruling
17 overruling the motion in limine; 179 on the basis of your
18 ruling overruling the motion in limine; 180, '81, '82, based on
19 your ruling overruling the motion in limine.

20 Those are the ones that are in evidence.

21 MR. MCCARTHY: Your Honor, two quick points. One, as
22 Your Honor recalls from the pretrial conference, there are a
23 number of exhibits that were admitted subject to the parties'
24 agreement on a limiting instruction with respect to hearsay
25 exhibits, and so we would again reserve the right to request

1 that instruction at appropriate times with respect to those
2 exhibits during the trial.

3 And is my understanding correct that your ruling just
4 now is with the exception of Plaintiff's Exhibit 128, which is
5 subject to our pending objection?

6 THE COURT: Yes.

7 MR. McCARTHY: Thank you, Your Honor.

8 MR. OSWALD: Your Honor, I agree with the motion in
9 limine. You gave it before in the preliminary instruction, and
10 you can give it again at the end with the jury.

11 Just one more: You then affirmatively admitted 201.
12 We offered that into evidence, and you accepted it into
13 evidence during trial. That's what I have as admitted.

14 Do I have that right?

15 THE CLERK: I'm going to have to go over everything.
16 I can't confirm everything.

17 MR. McCARTHY: For clarification, we will request the
18 limiting instruction at whatever point it is appropriate in the
19 trial, including at the close and whenever we think it is
20 appropriate.

21 THE COURT: Thank you.

22 Can we get the jury, please?

23 Ms. Ivie, will you step forward and take the stand
24 please.

25 (Open court; jury present:)

1 MR. OSWALD: Your Honor, can we ask that she be
2 called her from her seat?

3 THE COURT: Certainly.

4 MS. TALCOTT: Your Honor, that one is for the
5 witness. I have one for you. I was trying to be organized.
6 Mr. Magnuson knows it is there.

7 MR. OSWALD: It would that be okay if we call her
8 from her seat?

9 THE COURT: Go on back.

10 (Open court; jury present:)

11 THE COURT: Good morning, jury.

12 First of all, my apologies for the tardy start this
13 morning. I know you were all ready to go at 9:00 a.m. We
14 actually met at 8:15 and have been working hard right up until
15 this moment, so my apologies. I do appreciate you being ready
16 to go at 9:00 o'clock.

17 Thank you.

18 Mr. Oswald, call your next witness, please.

19 MR. OSWALD: Yes, Your Honor. Thank you.

20 MS. CHAMBERS: We call the plaintiff, Suzanne Ivie.

21 THE COURT: Thank you. Good morning.

22 THE WITNESS: Good morning.

23 THE COURT: Raise your right hand, ma'am.

24 (The witness was duly sworn.)

25 THE CLERK: Would you please state your name for the

S. Ivie - D

1 record, spelling your last.

2 THE WITNESS: My name is Suzanne Ivie. I-V-I-E.

3 THE COURT: Thank you. Ms. Chambers.

4 DIRECT EXAMINATION

5 BY MS. CHAMBERS:

6 Q Ms. Ivie, good morning. How long did you work at
7 AstraZeneca?

8 A I worked for 19 years.

9 Q And during those 19 years at AstraZeneca, what would get
10 you up in the morning? What were you passionate about?

11 A I loved the excitement of looking at the data and seeing
12 how my team was performing. I loved talking to my team. They
13 were amazing people, and it was very fun to talk about how they
14 were doing and performing. In fact, Sunday nights were always
15 considered like my favorite night. It is kind of weird. I
16 always kind of thought about it as, that night, after I put my
17 kids to bed, I would go into my office. Sometimes the data
18 would come in Sunday evening; usually it was Monday morning.
19 But it was always fun to come in to see if the data had come
20 in, and it was Sunday. And if it didn't, Monday morning was a
21 wonderful way to wake up to see how things were going. I like
22 to be driven by that kind of stuff -- the data and the
23 performance part. It was the fun part about the job.

24 Q What did you enjoy talking about with your team?

25 A Well, performance. You know, the numbers, how we are

S. Ivie - D

1 affecting the doctors, our messaging, our strategy, our
2 business plan, making sure that everything was lock-in-step;
3 that we all knew who we were calling on; who were the important
4 physicians to call on; who saw the type of patients that we
5 generally market to; just making sure that all of that is
6 completely in line with what we needed to do to be successful.

7 Q So let's go to the meeting that you had on August 24th,
8 2018. Let's set the scene a little bit. What is this meeting
9 for?

10 A This meeting is for the regional trainer, and it was
11 Stephani DiNunzio and myself. And we were going to talk about
12 some ways to improve the sales specialists', the pharmaceutical
13 sales specialists' way of opening a conversation, and it was
14 around insights. That's basically what we were going to talk
15 about.

16 The reason why I was on the call was about a month,
17 maybe a month or a month-and-a-half before this call, so in
18 June, or maybe at the beginning of July, Stephani DiNunzio had
19 asked me to be the regional district sales manager that
20 overlooks the regional trainers. So that's the only reason why
21 I was on the call, is because she had asked me to oversee
22 everything and be the lead of that.

23 Q Okay. So this is the phone call with you and
24 Stephani DiNunzio. Is there anyone else on the call?

25 A Yeah. Kateri Broussard, who was the regional trainer that

S. Ivie - D

1 Stephani had assigned, and then I was going to be over the
2 regional trainer.

3 Q So how were you feeling prior to this meeting?

4 A I was excited. I was excited. That's my love, that
5 coaching and training and coming up with strategies that
6 improve our sales performance. So I was all excited about it.

7 Q So we're on the call with you and Stephani and Kateri.
8 Who talks first?

9 A It was Stephani. I mean, she was the one who opened up
10 the meeting and kind of explained that she liked these
11 practices, and she wanted us to roll this out to the region and
12 we would have a better performance.

13 Q Who spoke next?

14 A She turned the time over to Kateri, because Kateri was the
15 one who put together the insights. I think Stephani might have
16 been participating in that as well. So she turned the time
17 over to Kateri.

18 Q What did Kateri say?

19 A Well, she had sent out an email, and I was looking it
20 over. It was some insights that they wanted to send out to the
21 region, and she wanted me to look it over, and that's kind of
22 who talked next.

23 Q So you're talking about this email that Kateri had sent
24 over before the meeting?

25 A I don't know if it was right before or just when we were

S. Ivie - D

1 on the phone call.

2 Q Okay. So who speaks next during the meeting?

3 A I believe it was me. I think I just said, "Hey, I'm
4 looking these over. I don't think we should be sending these
5 out. I don't know where the sources are." Some of them had
6 sources, but I'm like, "I don't know where these are coming
7 from. Are these Better Homes and Gardens?" I don't know what
8 the statements are. And they were out of context. It was just
9 a snippet of a word -- excuse me -- a snippet of a sentence.

10 So sometimes when you see that, if you read a couple
11 sentences before or a couple of sentences after, it doesn't
12 really mean that. So I was concerned, because I didn't know
13 the context of these sentences. So I just said, "I don't think
14 we should be sending these out, and I don't know if they are
15 compliant." So I was the one who spoke up on that.

16 Q Then after you say that, who speaks next?

17 A I believe it was Stephani. And she said, "Well, what's
18 wrong with it?" And I said, again, "I don't know the context
19 of these, and some of them don't have sources. And I just
20 don't think we should be sending these out."

21 Q Then who talks next?

22 A It was Stephani. She had said, "Well, if we put where
23 they come from, then can you approve them?" I was a little
24 taken aback. I was like, "I can't approve these. That's not
25 really my job description to approve these." I said, "I think

S. Ivie - D

1 it would help if you put some references behind them." But I
2 said, "I don't think we should be sending these out. I just
3 don't think we should be sending these out."

4 Q So what's running through your head at that point?

5 A Well, I was a little taken aback that I was being asked to
6 approve these, and I was just a little surprised that we were
7 sending these out.

8 Q And why were you surprised?

9 A They weren't being compliant. It just wasn't right that
10 we were sending these out telling the sales representatives to
11 use these out of context. There was no training. It just
12 wasn't right. There was something not right with this.

13 Q Okay. And so then how does the call end?

14 A It ended with Stephani asking Kateri, "Will you please put
15 the references on here and then let's send them to Suzanne, and
16 she can approve them, and we can roll these out to the rest of
17 the region."

18 Q So then after that call, what happened next?

19 A Stephani had called me -- and it wasn't that day. I
20 believe it was like the next day or the day after. And she
21 said, "Hey, I haven't received an email saying that you approve
22 these. We sent them over to you," or "Kateri sent them over to
23 you. We haven't received an email yet."

24 And I said, "Steph, I really don't feel comfortable
25 approving these."

S. Ivie - D

1 And she said, "Well, take another look at it."

2 I think it was a day or so later I talked to her
3 again. And she said, again, "Hey, you haven't responded."

4 I'm like, "Stephani, I don't think we should be
5 sending these out. Even if it has a reference, I just don't
6 think we should be sending these out."

7 So at that time -- I think it was the second time, I
8 was like, "Gosh, I wonder if we should send these out"; maybe
9 I'm not thinking right, or maybe I missed something. So I sent
10 it over to Teresa Grey. She is the compliance branding team
11 leader for -- it could have been for the U.S. or half of the
12 U.S.

13 I just sent her an email saying, "Hey, is it okay for
14 me to approve these to send these out to the field?" I just
15 wanted -- if I could, that's great. I didn't feel comfortable
16 without having some sort of compliance backing me up, saying
17 that this is okay. So I sent it over to her, and she
18 responded, I think it was a couple of days later. I think it
19 was Labor Day. Basically her -- in an email stated -- it was a
20 longer email -- it basically stated that we should not be
21 sending these out.

22 Her email also copied Stephani on this message. In
23 this email that Teresa Grey had sent, down at the bottom she
24 had said that there is additional training that she would
25 suggest that we take. And I read that. I had no idea that

S. Ivie - D

1 AstraZeneca had rolled out another training program. I am not
2 sure how -- maybe a couple of months before that -- about
3 selling with insights to kind of train us. So I had no idea.
4 I'm like, "Ah, this is great. I would like to have this
5 training," because I was in this situation, and I wanted to
6 know what we can and cannot do.

7 So I was all for it. I thought for sure it would be
8 a great thing. Then we got a message -- I got a message back,
9 and Stephani said, "Let's pause on this, Suzanne. There is no
10 reason to get CL&D involved." When I saw that, I'm like,
11 "Whoa. Wow. I can't believe that." And I kind of looked at
12 it, and I thought the tone might not be very happy either.

13 So I gave her a call just to kind of let her know my
14 thoughts and rationale about why I even sent it over to
15 Terry Grey. I had just called her and said, "Hey, I want to
16 let you know that the reason I sent this was to see the
17 compliance part so I could approve it." And she told me -- she
18 goes, "You shouldn't have brought anyone else into the
19 conversation. You went over my head." And I said, "Oh, that
20 was never my intent." My intent was to make sure that I was in
21 compliance and that I wasn't sending something out to a region
22 with nine states that they can start using. I just wanted to
23 be -- make sure that it was approved. That's all I meant with
24 it.

25 When she said, "You went over my head" -- Stephani

S. Ivie - D

1 saying, "You went over my head" -- I don't know if there was a
2 breath after that. She said, "How long have you been a
3 regional compliance champion?" And I was completely taken
4 aback. I don't even think there was like a breath in between.
5 And I'm like, "Oh, Stephani, I have been for about a
6 year-and-a-half." She is like, "Well, you may need to
7 reevaluate this." Once again, I'm totally taken aback, and I'm
8 thinking, "Oh, Steph, I love this role. I love my compliance
9 role, and I had learned so much from it."

10 And I said, "Oh, Steph, I really like it."

11 She goes, "Oh, you know, we will just think about it.
12 We will think about it." And that's the end of the call.

13 Q So you hang up the phone with Stephani: What's your inner
14 voice saying?

15 A I was a little bit confused, because that's not how I
16 thought the call was going to go. But I kind of remember
17 sitting back in my chair, thinking: So was I just threatened?
18 I just talked to her. We talked about compliance. Then all of
19 a sudden, she is asking me how long I have been a compliance
20 champion. And I was like, what happened in this phone call? I
21 was shocked.

22 Q Okay. All right. I want to quickly show you an exhibit.

23 Peter, if we can pull up Plaintiff's Exhibit 31 and
24 look at the bottom of 125. This is an email string from you to
25 Terry Grey dated August 31, 2018.

S. Ivie - D

1 If we can scroll down a little built, Peter.

2 Is this the email that you were referring to that you
3 said to Terry Grey -- about your question from the August 24th,
4 2018, call?

5 A Yes, it was.

6 Q So we just talked about these calls and the calls that you
7 had with Stephani. This is in August of 2018. Then I believe
8 you said that Stephani questioned your compliance role. So
9 that's in August. Did anything happen after that that you can
10 recall? Did anything happen in September following your call
11 to Stephani?

12 A Yes. So back in the June/July time frame, Stephani had
13 asked me to be the lead DSM for the regional trainers, and that
14 is kind of why I was on this phone call.

15 In September, she had said -- she gave me a call and
16 said, "Hey, I just want to let you know I'm going to take over
17 as the lead for the regional trainers."

18 I said, "Whoa. What?" You just appointed me this.

19 She said, "Well, I'm going to take over, so you don't
20 need to worry about it anymore."

21 I said, "Oh. All right."

22 She goes, "Well, it is within my authority to do
23 this."

24 I go, "I know. You are the commercial business
25 director."

S. Ivie - D

1 So she said she was going to take over, and I was no
2 longer needed

3 Q What was your gut telling you at that point?

4 A That's when it said she took me off because I didn't
5 approve.

6 Q Didn't approve of what?

7 A I didn't approve of that message. I guess it went over
8 her head. And at that point I'm like, "That's the reason I got
9 removed from this."

10 Q So that's in September of 2018. Let's fast forward a
11 little bit to December 2018. So is it right that from
12 December 10th to 12th, 2018, there was a regional management
13 meeting in Idaho?

14 A Yes.

15 Q So tell me about the meeting. Who is there? What are you
16 talking about? Who is leading the meeting? Walk us through
17 that.

18 A The leader of the meeting was Stephani. At the end of the
19 year the district business managers would come together and
20 talk about the year-end reviews for their sales
21 representatives, and that's the reason why we were there,
22 really. And we also talk about the branding strategy for the
23 following year, for like 2019.

24 Q Okay. So Stephani is leading this meeting. And what do
25 you recall from that meeting when Stephani is presenting?

S. Ivie - D

1 A Well, at the beginning it was just like a typical meeting,
2 kind of rah-rah, how things are going for the region -- the
3 typical starting of the meeting -- you know, the excitement.
4 Then she talked about it was kind of a rough year and that
5 performance needs to be improved, and she started talking about
6 profits and that we need to make more profits. Profits are
7 very important to the company. So I remember at the beginning
8 it was about profits.

9 Q And then did she talk about kind of the strategy of how
10 AstraZeneca employees should proceed to going forward in terms
11 of different perspectives or things like that?

12 A Yeah. I mean, it was about the profits, and then she
13 started talking about kind of like, the "old bus" and the
14 "new bus" and how we need more of the newer people. The "old
15 bus" people who had left were the right ones to leave. And she
16 talked about the "old bus" and the "new bus," and that's kind
17 of what -- I guess the next step of the whole meeting.

18 Q When she is talking about "old bus" and "new bus," what's
19 your reaction to that?

20 A Well, at the very beginning she started talking about the
21 "old bus" and "new bus," and we just kind of listening. Then
22 she drew a picture of the "old bus" -- well, a bus and kind of
23 a "new bus" on the whiteboard. And I just kind of watched her
24 draw the picture. I didn't think anything of it until she
25 pointed over and she said, "Now, this is the 'old bus,'" and

S. Ivie - D

1 she looked right at me. And then she went on. But she looked
2 right at me, and I could tell in her eyes it was right at me.
3 She was talking about that and talking about the "old bus."

4 And at that point I said, "Are we talking about age?"
5 And I kind of said it quietly. She kind of laughed, "Oh, no.
6 We are not talking about age. This has nothing to do with
7 age." I'm like, it has everything to do with me. And she
8 looked right at me, and it was not just like glancing. It was
9 right at me in my eyes. So we continued on with the "old bus"
10 and the "new bus."

11 Q So why did you think she was referring to age? Was there
12 something that she had said in the past that made you think she
13 was referring to age when she was talking about the "old bus"?

14 A Well, it was in the past. So we talked about Benatar. So
15 that kind of started out in the January time frame. But in the
16 end of March or April, maybe the first of April, we were at a
17 meeting at a hotel. We had just interviewed somebody for my
18 opening of my sales representative position. She had just left
19 and we had kind of talked -- we were just kind of talking. She
20 said, "Man, I thought you would have more wrinkles by now.
21 God, you got good skin, and you don't have any wrinkles."

22 I was kind of taken aback. She says, "You know, you
23 are aging well."

24 I'm like: Who in the heck who says this? Who says
25 this?

S. Ivie - D

1 And I'm kind of like, "Okay. Thank you. This is a
2 nice compliment."

3 Then she says, "What kind of skin care or night cream
4 do you use?"

5 So I just told her, "Josie Maran off of QVC."

6 So we kind of ended like that. She said, "Oh,
7 Benatar" -- she said something to the fact of "Benatar."

8 I said to her, "Oh, that's kind of embarrassing,
9 Steph. I really do prefer to be called my name in a
10 professional setting."

11 I was trying to be very gracious and nice. I wasn't
12 like, "You stop calling me this." I was just trying to be nice
13 and saying, "Hey, let's not do this."

14 And she kind of laughed. She goes, "Oh, it is just
15 for fun. You know, I'm trying to make a family. You know,
16 families call people nicknames, and that's just what I want to
17 do. It is just for fun."

18 So I kind of let it go. I am like, "All right." I
19 gave her a hint. It is embarrassing. I don't want to be
20 called that. I'm like, "All right."

21 Q Just going back to that Benatar nickname, didn't you like
22 the nickname initially?

23 A I didn't necessarily like the nickname, but she was giving
24 it to us and I thought -- she was a brand-new person, so I
25 didn't want to rock the boat with my manager, so I said,

S. Ivie - D

1 "Okay." You know, I did not push back at that point. I didn't
2 push back. I said, "All right. Benatar it is." She gave me
3 some other names too.

4 Q All right. Let's go back to the management meeting. So
5 we talked about Stephani presenting at this regional meeting.
6 That's December 10th through 12th. So what happened
7 afterwards? Do you have a phone call later with Stephani
8 shortly after that meeting?

9 A Uh-huh. So during the meeting up in Boise -- the meeting
10 we were talking about -- I missed one of the portions, the
11 DALIRESP portion, because I was on a teleconference with this
12 leadership program I was on. So she set up a time a day or two
13 later to kind of update me on the DALIRESP portion of the
14 meeting. So I was on this phone call with her.

15 Q Was anyone else on the call?

16 A Yeah. Aaron Griffith was also on the call. He missed
17 that portion of the meeting.

18 Q Let's walk through the call. Who talks first?

19 A Stephani. She just asked how we thought about the
20 meeting, kind of just like the typical niceties. And she
21 started going into DALIRESP and that we needed to win with
22 DALIRESP. DALIRESP was an important part, and we didn't do so
23 well, and we really need to focus on DALIRESP.

24 Q When she said that, what are you thinking?

25 A I'm okay with that. We need to focus on DALIRESP.

S. Ivie - D

1 Nothing out of ordinary on that. But then she started talking
2 a little bit about the branding strategy, and that's where it
3 all came -- whoa -- this isn't right. So that's where it kind
4 of went awry.

5 Q So she is talking about DALIRESP and the need to increase
6 sales in DALIRESP, right?

7 A Uh-huh.

8 Q So then you said the conversation turns to brand strategy.
9 So walk me through that. What does she say?

10 A So she talks about brand strategy, and she said that she
11 was in a meeting with the brand team and that 50 percent of the
12 patients die after their first exacerbation with a COPD
13 product, and I had never heard that. That seems awfully
14 high -- very high. And so when she was asked, like where did
15 you find this from? She goes, "Oh, well, the brand team. Just
16 Google it. You can find anything on Google."

17 I went, "We are now Googling information we are
18 giving to doctors?" I'm like, "Geez, no, no, no. This isn't
19 right."

20 Then she proceeded on talking about, you know, "We
21 need to expand our patient population." DALIRESP was for the
22 severe COPD patient, and she started talking about the mild to
23 moderate patient and expanding, and she brought up primary
24 prevention with it. And I'm thinking, did I miss something?
25 Was there something that I missed on the studies or did the

S. Ivie - D

1 package insert label change? I was totally confused about
2 this. I didn't know where we were coming up with this
3 information.

4 Q Okay. So after she tells you, "Oh, go Google it," who
5 speaks next?

6 A I think the call pretty much ended after she was telling
7 us the strategy. So it wasn't right after the "Google it."
8 There was more to it. "There was 50 percent exacerbation,
9 Google it, primary prevention, mild to moderate."

10 Then after that, I kind of stayed a little bit quiet,
11 because I'm like, "Wow. Did I miss something?" Then I think
12 the conversation just basically ended.

13 Q So you hang up the phone. What do you do next?

14 A Well, I looked at the package insert to see if I was in
15 error. Did I miss an email saying that we have this stuff?
16 And so I kind of looked at different aspects of what did I miss
17 and where did we get this from. I looked over some of the
18 brand strategy information that the brand team had sent
19 probably a week before that or so to see if there was something
20 in there, and I was trying to do my due diligence, thinking,
21 well, I'm sure I missed something.

22 Q So did you -- did you call Linda Truax after this meeting?

23 A I did. Yes.

24 Q Why did you call her?

25 A She knows the products very well, and she knows the

S. Ivie - D

1 compliance very well. I wanted to -- I'm trying to do my due
2 diligence, thinking, all right, it's my fault that I don't know
3 this. So I went to Linda, and I just said, "What do you think
4 of this? Do you know anything about this? What is your take
5 on this?"

6 So I did talk with her.

7 Q Okay. Then after your call with Linda, how are you
8 feeling?

9 A Well, now I'm feeling anxious, because she just confirmed
10 that I wasn't like thinking that I was crazy; that she hadn't
11 heard anything like this; that she doesn't know any of the
12 data, and she is very good with the data. She just confirmed
13 in my mind that I wasn't going crazy.

14 Q Okay. So I want to pull up Defense Exhibit 545 and look
15 at line 324. So Defense Exhibit 545, these are your text
16 messages, right?

17 A Yes, they are.

18 Q Looking at line 324, it looks like you sent a text message
19 on December 17th, 2018, at 2:42 Mountain Time, right, to
20 Mandy Hosford?

21 A Mandy is a scientific liaison for AstraZeneca. She is in
22 medical affairs. She has got her Ph.D. in pharmacy. Like I
23 said, she was a medical affairs person. So she knew all about
24 the studies. She would be able to talk to physicians more in
25 depth, and, also, off of the package insert, she would be able

S. Ivie - D

1 to discuss studies that were not necessarily in the package
2 insert. She was very knowledgeable.

3 Q So why are you reaching out to her on December 17th?

4 A Well, once again, I talked with Linda. I'm looking
5 through my own things, and I just wanted to see if we could
6 talk about primary prevention with DALIRESP. So she would
7 know, and she would know a little bit more of an instruction on
8 giving me some background on it; why I would start discussing
9 that. Also -- well, there is the answer right there. So that
10 was kind of my whole conversation with her. I just wanted to
11 see -- I guess get some more insight into what are we doing.

12 Q Okay. Thank you.

13 We can take that down.

14 Okay. So that was December 17th. Then you have a
15 performance -- a meeting or -- a performance meeting with
16 Stephani DiNunzio on December 18th; is that right?

17 A Uh-huh.

18 Q So you sent this email to Mandy the day before. You have
19 this meeting with Stephani tomorrow. What are you doing, if
20 anything, in preparation with your meeting with Stephani?

21 A So after I talked with Mandy, I was absolutely sick,
22 because -- I'm like: All right. I'm going to talk to Stephani
23 about this and let her know there is no back-up for any of
24 these statements. And I didn't want to do it. I'm not going
25 to tell my team to do it. And I'm going to tell her it is

S. Ivie - D

1 illegal.

2 So when you are thinking of this thought process in
3 your head, and you are about to address this issue with your
4 manager, you're not in a comfort state of mind. So after I
5 talked with Mandy, I went and kind of wrote down some notes,
6 saying: All right. We are going to need to talk about some of
7 the off-label promotion. I am going to have to kind of
8 confront her and just say, "We are now illegal. It is not just
9 unethical or dangerous. This is literally illegal. We don't
10 have these indications. We don't have this primary prevention.
11 I don't know where in the heck you're getting this 50 percent
12 of patients die after their first exacerbation."

13 So I'm writing up some things and saying: Okay,
14 well, we will have our call. I'm just going to start talking
15 about that with her.

16 Q I guess just explain to me a little bit more, why are you
17 so concerned about these statements? What does it matter?
18 Stephani is saying she had some source for it -- maybe on
19 Google. What's the issue?

20 A Well, the issue -- you know, 50 percent of patients die
21 after the first exacerbation was kind of like a weird -- weird.
22 But the problem is primary prevention. The drug is not
23 indicated for primary prevention. There could be -- there is
24 alternatives for primary prevention and to help them. There is
25 kind of a step approach in medicine. You start here. When

S. Ivie - D

1 there is another step, you start here, and you have this step
2 approach. Well, this step approach is here, and primary
3 prevention is like the beginning here, we are indicated for
4 severe. We may want to make a profit, and that is how you make
5 profit, when you open up more of a patient population. But
6 that's not -- that's not what we do. We don't make profit off
7 of that. That's just downright illegal.

8 Q All right. I think we talked about the night before, you
9 are preparing for your meeting with Stephani. So now you have
10 your meeting with Stephani. Is it on the phone? Is it in
11 person?

12 A It was on the phone.

13 Q On the phone.

14 All right. So who talks first during the meeting?

15 A It was Stephani. We do kind of like our -- again, we do
16 niceties on the phone. How are you doing? What's going on?
17 That's what you do on the phone.

18 Then kind of after the niceties, I just said, "Hey,
19 Steph, I want to talk to you about some things." I said,
20 "Look, I'm really uncomfortable what was said on that call. I
21 don't know where you are getting this 50 percent patients die
22 after the first exacerbation, and I certainly don't Google it.
23 We shouldn't be Googling our medical sources."

24 Then the next one, I said -- and the next ones are,
25 "These are illegal. We don't have primary prevention, and we

S. Ivie - D

1 don't have mild to moderate patient population that we should
2 go after for DALIRESP." I said, "It is unethical, Stephani,
3 and it is illegal. This is not right. We aren't going to do
4 this."

5 Then she went in and said, "You don't understand the
6 need to make a profit." And she said, "I have to win in 2019.
7 We had a bad year in 2018, and we are all about profit. This
8 is the old way of thinking, when you don't think about the
9 profits, because that's what we are here for. At AstraZeneca,
10 we make money. We are not a nonprofit organization, and we
11 need to do this. 2019 is going to be my year."

12 And I told her, "Steph, I know we make a profit. I
13 know we are not a nonprofit organization, but I'm not doing
14 this. I'm not doing this. This is illegal, Stephani."

15 And I'm all about winning. I like performance. I
16 like the analytics. I like the market share. I knew it was
17 about performance. But I told her, "I'm going to win the right
18 way, and this is not the right way. This is just downright
19 illegal, and I will not do this. This could hurt patients and
20 get them the inappropriate medications."

21 Q And what did she say?

22 A She went over it again, saying, "You don't understand.
23 You don't understand. We are going to win in 2019." She just
24 kept saying that. "We're going to make profit. You are just
25 not getting it. We are going to make a profit."

S. Ivie - D

1 Q Okay. Do you say anything in response?

2 A I just said, "I'm all about winning, but I'm not doing it
3 this way." I said, "It's illegal."

4 Q Is there anything else that is said on that topic?

5 A I think she went into my coaching days.

6 Q Okay.

7 A So after I said that again, she said, "I'm going to talk
8 to you about your coaching days and your with and without
9 customer engagement. Your numbers are low. You're supposed to
10 be 80/20."

11 I'm thinking: I know; I know. I said, "Stephani, I
12 know. And you know." And she was kind of all over the place.
13 I think it was because I said "illegal." But the document that
14 she showed me, and I think you guys have seen that before, she
15 said, "Well, you are like" -- I don't know what it was -- "a
16 48/52 split." And I said, "Yes, I know. I know I have been
17 doing that."

18 And she said, "Well, you shouldn't be doing that.
19 There is an 80/20 rule." And I said, "Well, Stephani, one, it
20 is not a rule. And two, we have been talking about this. I
21 told you what I have been doing."

22 Then we talked about some -- like some of the other
23 performance stuff too. It was not like a pleasant performance
24 talk. Maybe I should have waited until at the end of the call
25 to bring this up, but it was not a pleasant call.

S. Ivie - D

1 Q Okay. You talk about the coaching days. You mentioned --
2 you told Stephani, "We had talked about this." What are you
3 referring to there?

4 A We talked about coaching days back in June and actually I
5 think it was even at the beginning of the year. I told her
6 that I did more coaching via the phone. I do a little bit of
7 both. And she was totally fine with it, because I did have an
8 expansion of a territory. I had a bigger territory. My team
9 is extremely experienced. There was a lot of travel. There
10 was some travel within like the Salt Lake area where I am.

11 But I told her that. And I had a bunch of different
12 projects, and like everything is just working out beautifully.
13 I told her in June, too -- I said, "Well, you can always look
14 on my field coaching forms, because I try to remember when I'm
15 talking on a phone call, I will usually say, 'Thanks for this
16 discussion,' or 'As we talked' or 'Thanks for the call.'"

17 I tried to do that in the first one or two sentences,
18 so that she would kind of know, because I know she looked over
19 the field coaching forms. And she said, "Oh, okay. That's
20 good to know. That's great to know."

21 So I was doing this on the field coaching forms.

22 Q Okay. All right. So you said, after talking about the
23 coaching days, then you start talking about performance. So
24 she did show you a document about your coaching days, right?

25 A Yes.

S. Ivie - D

1 Q Did she show you a document of your performance review?

2 A She wrote up some stuff, but I didn't know that was going
3 to be the performance review at all. But, no, we talked about
4 the numbers and kind of the performance for 2018.

5 Q And so what did you talk about in terms of performance in
6 2018?

7 A It wasn't my greatest year. I had some pretty amazing
8 years before that. I think the first trimester, I think I was
9 107 or 108. Then the next two, I was about 97, 98 percent to
10 objective. The objective, of course, is 100 percent. I was a
11 little bit below that. Then fourth quarter, I was pretty darn
12 close. I was shy of 100. I think it was 99.4. I was a little
13 bit under, and so we talked about that.

14 Q Did she tell you what performance rating you would be
15 getting?

16 A Well, she said, "Maybe a two." Then she said, "Well,
17 maybe a one," kind of under her breath. I said, "What are you
18 talking about?" And that's kind of how we left it.

19 Q So it seems like you were surprised by saying a one or
20 two?

21 A Well, I never received a two, and I have never received a
22 one. I haven't even been talked to about a one. Basically
23 what the one is, it says: You've got a few months; go look for
24 another job; get out of here.

25 And I was completely shocked. Absolutely shocked.

S. Ivie - D

1 Q Why were you shocked? You said you had not the best year
2 in 2018.

3 A Because you just don't get a one because you're at
4 97 percent to objective or anything like that. It was more
5 like a vindictive thought process. There was no -- I mean, you
6 have to be told you are getting a one. Usually you are on a
7 performance improvement plan, something to that extent.

8 Q All right. So we are done with the call on December 18th,
9 2018. We talked about all the aspects that were discussed
10 there. So you hang up the call. How are you feeling?

11 A I'm absolutely devastated. The call didn't go well, and I
12 just told my manager that the illegal action is going to stop.
13 I'm not going to do her instructions. I will not lead my team
14 this way. I had a conversation that now I'm getting a two or a
15 one. When you get a one, you leave the company. Is this my
16 warning? What is this?

17 And I was absolutely devastated. I was in my office
18 when we talked. Then I went into my bedroom, and I just like
19 started to cry. I told my husband, "I think I'm getting a one.
20 I don't know what's going on." My performance wasn't, like, a
21 stellar performance, but it wasn't that bad. I mean, people
22 have performed a lot worse in the year than I had, and they are
23 still with the company, and the company believes in them. And
24 I was literally just devastated.

25 Q So while you are kind of lying in bed, you're upset. What

S. Ivie - D

1 do you decide to do next?

2 A I was kind of talking to my husband and I said, "Brian" --

3 MS. RIECHERT: Objection. Hearsay.

4 THE COURT: Ms. Chambers.

5 BY MS. CHAMBERS:

6 Q Can you tell me what you did after. You're upset. I
7 understand you talked to your husband. So let's just kind of
8 go back a moment. What are you going to do next?

9 A Well, I was very upset, and I didn't know what to do. I
10 had tried to talk with the medical liaison. I talked with
11 Linda. I did my own work, trying to figure things out. And I
12 am now telling my manager that I will not lead my team like
13 this. I will not do this. I had just called her out on
14 ethical and illegal behavior. And I did tell her in that
15 conversation that it is going to stop now. "It's stopping
16 right now."

17 So I said, all right, I'm going to have to go, once
18 again, I guess above her, and talk to our ethics department.

19 Q Okay. So you filed a complaint with the ethics line?

20 A Well, I actually started writing it out, because on the
21 ethics line you can also write up your story, and I just --
22 every time I would write another sentence or put something on
23 paper, I just got like this pit in my stomach and just started
24 to kind of cry. And I said, "I can't finish writing this." So
25 the other option was to call them, and this other person on the

S. Ivie - D

1 line would kind of write down your thoughts.

2 Q All right. Let's pull up Plaintiff's Exhibit 75. It is
3 also in the juror notebook. If we can scroll down a little bit
4 to the paragraphs.

5 Okay. So there are several paragraphs here. I won't
6 go into it in detail. But is this generally what you told the
7 AstraZeneca ethics line?

8 A Yes.

9 Q This is your complaint.

10 Okay. So I noticed that you talked to Stephani about
11 DALIRESP during your meeting on December 18th, but I'm not
12 seeing that in this write-up. Do you know why?

13 A I think it was just so much that -- I don't know. When I
14 was penning things down, at that point I went into my kitchen.
15 I didn't even want to sit in my office and have this
16 discussion. So it was just -- there was so much of it that it
17 just slipped my mind, but I did talk to compliance about it in
18 January.

19 Q Okay. We will get there.

20 If we can look at the bottom of 871, the last
21 paragraph, Peter.

22 It says, "The caller feels Stephani will start doing
23 something else other than taking leadership roles away and
24 threatening. It is not within the caller's ability to do
25 things against policy. The caller doesn't want to be

S. Ivie - D

1 considered an 'old bus' person. The caller has experience and
2 has done extremely well. The caller can't sleep at night
3 because of unethical practices and would like to do his/her job
4 without feeling like he/she is violating ethics. The caller
5 would like to win the right way and do the right thing."

6 Is that what you told the ethics line?

7 A Yeah.

8 Q So it is true you weren't able to sleep?

9 A I didn't sleep. I would try and go to sleep and things
10 were just, like, floating in my mind. I couldn't turn my mind
11 off. So I wasn't able to sleep. I was pacing. There were
12 lots of tears, just like a knot in the stomach, like an ulcer
13 knot in your stomach, because I had done something that I had
14 never done before.

15 The whole conversation was just getting heated and
16 heated, and I could tell she was getting angry with me. For
17 the last few months, it wasn't just that. But that call on the
18 18th, it was a heated call.

19 Q And so in your 19 years at AstraZeneca have you ever filed
20 a complaint with ethics?

21 A No.

22 Q Have you ever accused a manager of off-label marketing?

23 A No.

24 Q So you had filed the complaint -- and so this is
25 December 18th, probably around the holidays. Then you told me

S. Ivie - D

1 that in January you get interviewed about your complaint. In
2 that time frame, when you file the complaint and before you get
3 interviewed, what is happening with you?

4 A I filed it on the 18th. And after that, it was pretty
5 nerve-racking, but we were going into Christmas. And it was
6 one of our favorite family times of year. And I was
7 devastated. So it was Christmastime, and we do family parties.
8 You're happy. I have got younger children and I couldn't -- I
9 couldn't -- I couldn't do it. For the first time -- one
10 second.

11 So for the first time ever we had no Christmas
12 decorations on the tree. We had our lights up, but I couldn't
13 even do it. I couldn't do it. We didn't have the decorations.
14 My kids tried to do some of it, because I had the box out. I
15 couldn't do it. I was trying to keep this from my kids and
16 trying to be kind of like the ho-ho spirit for Christmas, but
17 it just wasn't the same. I wasn't necessarily able to function
18 during that time.

19 So we got over Christmas, and I made sure the kids
20 were happy and all of that. Then right after that, my family,
21 we were going to go on our big vacation to the
22 Dominican Republic. So I am like, all right; I have got to
23 chipper up, and we are going to go there. Still, I'm just,
24 like, so nervous. I knew AstraZeneca was off for about a week,
25 and I wouldn't hear anything about the compliance, but I

S. Ivie - D

1 thought I would hear something fairly soon. So I took my iPad
2 with us to Puerto Rico -- excuse me -- the Dominican Republic,
3 just in case I wanted to get an email or see what was going on.

4 And we were at -- the second day, after we checked
5 into the hotel, my husband could kind of see that I'm starting
6 to break down. I'm like, "You have got to make this good for
7 the kids." And that second night -- I was pretty good on the
8 first night. On the second night, he could see that I was
9 just -- you could see the anxiety. You could see my -- my
10 muscles, I just couldn't even move.

11 So he grabbed me and took me out on the beach, and we
12 found this little cabana on the beach, and I just start sobbing
13 and sobbing, telling him, "I don't know what they did" -- and
14 that I was really scared. And he was just trying to be
15 reassuring; that I just did what I thought was right; and that
16 it is all going to be okay. "Let's try to get through the
17 vacation. We are in a beautiful place, and we've got our kids
18 there. And we have fun things planned." So we were just going
19 to try to focus on that. And so we did.

20 Q Okay. All right. So let's move along now -- you're
21 talking about your anticipating for the interview of your
22 ethics complaint, right, and you thought maybe you would hear
23 from them.

24 A Yes.

25 Q Then you return back from the Dominican Republic, right?

S. Ivie - D

1 A Yes.

2 Q So did you end up getting a call from someone at
3 AstraZeneca about your complaint?

4 A Yes. They sent an Outlook calendar invite, and so I knew
5 it was going to be on the 15th of January.

6 Q So on the 15th of January, you are interviewed, right,
7 about the complaint?

8 A Yes.

9 Q And isn't it true that the initial complaint was
10 anonymous, right?

11 A Yes.

12 Q So on the call -- just kind of tell me generally what was
13 discussed?

14 A So Karen said that there was an anonymous complaint and --
15 oh, and Mike Pomponi was also on the call. Karen basically
16 spoke. Karen had said there was an anonymous complaint. And I
17 said -- I think it was the very first thing I said. "Karen,
18 you know darn well it was me."

19 She said, "All right."

20 And Mike said, "Yes. We know it is you."

21 Q So let's look at Plaintiff's Exhibit 69, which I think
22 also might be in the juror notebook as well. Are these the
23 notes from your interview with Karen Belknap and Mike Pomponi
24 on January 15th, 2019?

25 We can scroll down a little bit.

S. Ivie - D

1 A Would you? Yes. Uh-huh.

2 Q So this reflects kind of the summary of what you told
3 them?

4 A Yes.

5 Q Okay. Thank you. We can take that down.

6 All right. So you have the call. We looked at the
7 summary of what you discussed. How are you feeling after that
8 call?

9 A They were willing to listen to me, and they were very nice
10 about it. The call ended saying, "Hey, we are going to take
11 this seriously, and we are going to get back in touch with you
12 soon." So I was like, "Thank you." They said that they were
13 going to keep it anonymous, because I had kind of stressed,
14 "Hey, please, let's not use my name."

15 They were great. They made me have hope that, okay,
16 we are going to get this resolved, it is going to be quick, and
17 I'm totally good to go. I was like, all right, we are getting
18 there.

19 Q Okay. All right. So that's January 15th, 2019. A few
20 days after, do you have a district meeting?

21 A Yeah, I believe two days after, on the 17th.

22 Q Did you talk about this district meeting in your interview
23 with Karen and Mike?

24 A Oh, yeah. I talked with Mike. I said, "Look, I'm really
25 worried" -- this is when I brought it up to Mike, saying, "Hey,

S. Ivie - D

1 this also happened" -- this DALIRESP, 50 percent, patients die
2 with exacerbation. So I kind of talked to them about this. I
3 said, "Look, she is coming to my meeting in two days. And I am
4 really concerned. I told her I will not do this with my team.
5 I'm not rolling this stuff out. I am worried. She is going to
6 be there, she's going to be talking, and I'm afraid this is
7 what she is going to have a conversation about."

8 Mike just said, "Don't worry about it. It hasn't
9 happened yet. So let's not worry about that."

10 I'm like, well, it hasn't happened yet, so let me not
11 worry about it, and so we will see what happens.

12 Q Let's look at Plaintiff's Exhibit 29 towards the bottom of
13 this page. It looks like an email to you from Terry Grey on
14 January 15th, 2019, right?

15 A Yes.

16 Q So this is probably the same day you interviewed with Mike
17 and Karen.

18 If we can scroll down a little bit, Peter, to the
19 next page.

20 So you say here that you're getting ready for your
21 first 2019 district meeting, and you had questions about
22 DALIRESP, right?

23 A Yes.

24 Q So why are you sending this?

25 A Well, Terry Grey is the compliance person, and I just

S. Ivie - D

1 wanted to see if there was anything approved, making sure --
2 again, Terry was very helpful before, just making sure was that
3 there is some sort of promotional stuff. It may be just basic
4 promotional information. So I was just kind of reaching out to
5 her, making sure I had all my information right, and so that
6 was what I was doing.

7 Q Okay. Now let's look at Plaintiff's Exhibit 30. Okay.

8 Scroll down towards the bottom, Peter.

9 All right. You do receive this email dated
10 January 25th, 2019. It looks like this is the response to your
11 questions, right?

12 A Yes. They talked about some unbranded insights.

13 Q Okay. The second line there says, "We don't have anything
14 that specifically says that 50 percent of patients die on their
15 first exacerbation," right?

16 A Yes.

17 Q And they continue to talk about a one-page unbranded
18 insight; is that right?

19 A Yes.

20 Q Thank you, Peter. We can take that down.

21 So on January 17th, we have the district meeting with
22 Stephani; she attends?

23 A Yes.

24 Q And what do you recall from that meeting?

25 A I did the opening or what I would like to call the

S. Ivie - D

1 "rah-rah."

2 Then we looked at performance and did that kind of
3 information. Then I turned the time over to Stephani. She was
4 going to talk about kind of the stuff that was going on with
5 AstraZeneca, kind of where we need to be as a sales region,
6 like her region, and how we needed to win this year. She did
7 the presentation on that, and it was a formal presentation that
8 I believe that AstraZeneca put together, and so she was going
9 through that.

10 And then at the end she kind of sat down, and she
11 started talking about different products, SYMBICORT and then
12 she brought up DALIRESP. And she was sitting down at this.
13 And she said, "Hey, with DALIRESP, we aren't doing well." She
14 said something to the effect, "We need to expand our patient
15 population. We got to win with DALIRESP. We are going to go
16 after that mild to moderate patient with DALIRESP."

17 Q And what was your reaction to that?

18 A I was standing up, and she was sitting down, because she
19 just finished her presentation, and she did that. So it was my
20 turn after that. I was standing up, and I just about fell
21 over. I went: No, no, no. No, this isn't good. You know, I
22 was just -- I'm like, oh, no. Then right after that, she left.

23 Q So let's look at Plaintiff's Exhibit 8. So this is like
24 an email from you on January 18th to Mike Pomponi and
25 Karen Belknap. So tell me what is this email and also can you

S. Ivie - D

1 explain the image that you included.

2 A Yes. So on the phone, on the 15th with Mike, I had said
3 that I had concerns about DALIRESP, and I kind of went over
4 that with him. He was the one who said, "Oh, let's not rush to
5 conclusions. It hasn't happened yet." So this was right after
6 my meeting, because it ended on the 17th. So the next morning
7 or day I wrote him a message saying, "Hey, Mike. It happened.
8 I'm very concerned about this. Here we are again. I'm at the
9 same place." And I said to him, "My team, we are not doing
10 this, and it is putting me in a very uncomfortable position."

11 Q What is this image that you included in the email?

12 A So she had talked about the mild to moderate patient
13 population that we needed to start going after, expanding the
14 patient population. I just sent a snippet of the DALIRESP
15 package insert just to make sure he understands that -- I guess
16 his whole level -- I believe he is a lawyer, and so I didn't
17 know where his level of understanding is. This is our label.
18 So I took a snippet of the label where it says, "Treatment to
19 reduce the risk of COPD exacerbations in patients with severe
20 COPD." So I wanted him to just know that's what I was
21 referring to.

22 Q Thank you, Peter. You can take that down.

23 So after the district sales meeting, when is the next
24 time you had a discussion with Stephani about insights?

25 A It was the end of January. I don't remember the date on

S. Ivie - D

1 that. It was the end of January.

2 Q Okay. And so was it a phone call or an in-person meeting?

3 A No. This was a phone call, and it was with other district
4 sales managers as well throughout her region.

5 Q Okay. So what was discussed on this call?

6 A We were talking about the -- it wasn't just DALIRESP. We
7 had several products for COPD. It was about insights. One of
8 the insights that I guess we were emailing out to the region
9 then, even though we had had notification that we shouldn't be
10 doing this, she was going to email this out to the region, and
11 it was with Kateri as well, who was the regional trainer, and I
12 believe it was the first or second bullet point. It said that
13 the COPD medication, DALIRESP, that she linked it with anxiety
14 and depression patients, and that was extremely concerning for
15 me.

16 Q Why was this so concerning for you?

17 A Well, if you look at the package inserts, our products can
18 have adverse events or side effects with the other medications
19 for anxiety and depressed people. If you look at DALIRESP, it
20 said that it will cause additional mental health issues, and
21 for those patients who are suicidal it can increase their
22 attempts for suicidal behavior.

23 And we don't -- that's dangerous. If you have got
24 people who have got COPD, they're pretty fragile. Most of them
25 probably have some sort of anxiety and depression, and if we

S. Ivie - D

1 are linking our product to that, that's not right. Then all
2 I'm thinking about is there is the suicidal aspect of it, but,
3 you know, people could be suicidal, and without the doctors
4 knowing or without the doctors telling their loved ones, they
5 could be thinking, "Oh, geez, my loved one is more suicidal;
6 they are starting to talk more about it," and they have no
7 idea. It's probably their medication.

8 Q Okay. So did you report what you heard about DALIRESP --
9 or the respiratory products being linked with depression and
10 anxiety? Did you report that?

11 A Yes, I did.

12 Q So let's look at Plaintiff's Exhibit 81 on page 907. It
13 is also in the juror notebook. Okay. So is this your report
14 about DALIRESP?

15 A Yes.

16 Q If we can look at the first paragraph, starting with the
17 second sentence, "I'm being asked to illegally ask for patients
18 outside of our indication. We are supposed to insinuate --
19 wink, wink -- that our respiratory products, BEVESPI,
20 SYMBICORT, and DALIRESP have COPD and anxiety and depression
21 indication and that feeling it working will result in increased
22 adherence."

23 A Yes.

24 Q So you wrote that?

25 A Yes.

S. Ivie - D

1 Q And then in the second paragraph you reference the
2 Act Right Now compliance guidelines. What is that?

3 A Act Now, I believe, is a federal statute that you act now.
4 When you see something that could be dangerous to the public,
5 the public's health, you act now, and so you report it instead
6 of waiting and wondering if somebody had increased anxiety or
7 suicide or whatever. It was an "act now," because I thought:
8 Danger to society.

9 Q Thank you, Peter. I think we are done with that one.

10 So that was in early February that you made that
11 complaint? Did anything else happen in February that you can
12 recall?

13 A Of?

14 Q Did anything happen with your -- how was work going in
15 terms of your district's goals or your work schedule? Anything
16 else?

17 A Goal-wise or performance-wise, we were actually doing
18 pretty good, I guess, the first quarter of -- the first couple
19 of months of 2019. We were doing very well. There was a lot
20 more anger issues that we were kind of dealing with. I could
21 tell Stephani was very frustrated with me. Everything kind of
22 changed -- her personality -- towards me. She really liked me
23 at the beginning, and I did a ton of stuff. Everything was
24 going well, and now it has turned. It was bad.

25 Q Okay. So you had made that complaint on February 5th,

S. Ivie - D

1 2019. Later in February 2019 do you have a meeting with
2 Stephani and Karen Belknap?

3 A I did.

4 Q Do you remember the time frame of that meeting?

5 A It was like mid-February.

6 Q Mid-February. So how did you learn about that meeting?

7 A Well, I was on a call, like an every-other-week call on
8 Fridays that we have with Stephani. We talk, you know,
9 basically what's going on in the territory, performance, teams.
10 It is a basic call that you would have every other week. At
11 the very end of the call she tells me, "Hey, just one more
12 thing: On Monday, we're going to talk about some activities
13 that have been going on -- some of your activity." And I said,
14 "Oh, okay." She said, "Oh. And I invited Karen Belknap to be
15 sitting in on this." I said, "Oh, you know what, that's a
16 great idea. That's really good. Good. I think this would be
17 a really good call." So I thought it was going to be a great
18 call.

19 Q What did you think was going to be discussed on that call?

20 A I thought it was the activities that we had been doing
21 about the reports, and basically we were going to get this
22 resolved, saying, "Hey, let's get on a level playing field;
23 maybe we need more training on indications, dosing. Let's come
24 together to see how we could fix this." That's what I thought
25 it was. I was excited for this call, thinking we were going to

S. Ivie - D

1 get all of this taken care of.

2 Q So then you get on this call in mid-February. Karen is on
3 the call, you, and Stephani DiNunzio. Who talks first?

4 A Stephani does.

5 Q What does she say?

6 A She says, "We want to talk about some of the activity."

7 Q Then who responds?

8 A I think it was her again. Karen Belknap is somewhere in
9 the very beginning of the call and said, "Hey, I'm Karen, and
10 I'm going to be on the call. How are you doing?" Again,
11 niceties.

12 So Stephani goes on with these activities, and she
13 sent something over. I'm thinking to myself, "What are we
14 talking about? Where are we going?" Because the night before
15 I put stuff out -- you know, my complaint -- and so I had
16 everything all ready to talk about this, and she is going
17 somewhere totally different than from where I had -- I had no
18 clue where we were going with this.

19 Q So what did she start saying?

20 A She said, "I'm concerned about your activity and field
21 coaching and your percentage of customers with and without
22 customer engagement and all your field coaching forms."

23 Q Okay. What were you thinking at that time?

24 A I'm completely blindsided. I don't even know what to
25 think, because here I am getting ready to talk about this, and

S. Ivie - D

1 we are here over somewhere. I was playing catch-up mentally.
2 I'm like, "What are we doing?"

3 Q Do you say anything in response?

4 A Stephani said, "So are these numbers right, with your
5 customer and without customer engagements," and I'm looking at
6 it 48 -- I can't remember. 50/50. Something like that. I
7 said, "Yes. Yes, they are my numbers."

8 Q What did she say in response?

9 A She said, "Well, you should be 80/20." I told her
10 "Stephani, you know it has been the whole year, and you are
11 bringing it up now. It has been a whole year, and you have
12 known this. You know what I was doing in my coaching."

13 Q And how did she respond?

14 A She said, "It's a policy. And I'm very concerned that
15 your team is not getting coached, and we are here to discuss
16 this. I talked to you several times about this." And I'm
17 like, "Yeah, I know. We talked several times about this,"
18 so --

19 Q Okay. And when she said that there was a 80/20 policy,
20 what was your reaction to that?

21 A I heard about the 80/20, but it was never a policy. It
22 was kind of like a guideline, saying that's probably great.
23 You work with your manager. It depends on your territory. It
24 depends on the district. There was nothing like cut and dry;
25 that this is it; that this is how it is. We've gotten reports

S. Ivie - D

1 at all different times and people throughout the nation had
2 different numbers. And I had different numbers. I'm usually
3 fairly high. I do go kind of go back and forth. But never
4 once did I think, oh, this was cut and dry, and this is how it
5 is.

6 Q But didn't Stephani send you a number of emails in 2018
7 about what she wants for coaching and what should be in-person
8 coaching?

9 A Yes.

10 Q And so isn't that -- doesn't that make it clear that it's
11 a requirement?

12 A Well, she did send those out. I did see those. But in
13 June, we had another conversation about it, and I said, "Steph,
14 this is what I am doing. These are the coaching forms. When I
15 do this, I usually say, 'It was nice to have a discussion with
16 you' or 'nice call,' but this is what you are going to see in
17 my field coaching forms."

18 I said, "I have got such a polished team, and they
19 are so successful. We've got career ladder fives." And so I
20 kind of stand back a little bit. I have these other activities
21 I'm doing. I'm starting to see some activities that I might be
22 promoted within the company. And she knew exactly what I was
23 doing. It wasn't like she, all of a sudden, got a report in
24 December saying, "Here it is." I had been turning my coaching
25 forms in and then we get this data.

S. Ivie - D

1 Q Let's look at Plaintiff's Exhibit 177, which is also in
2 the juror notebook.

3 Thank you.

4 Okay. So at the top this is an email from Stephani
5 to you, July 27th, 2018, right?

6 A Yes.

7 Q And if you'd scroll down a little bit, this is an email
8 from Stephani to Mike Hartman in July 2018 and this -- well,
9 what is your view what this email is?

10 A From what Mike says down at the bottom, some of the
11 numbers are a bit out of whack.

12 Q And Stephani responds saying that the two of you have
13 discussed that issue a couple of times, right?

14 A Uh-huh.

15 Q Then she mentions that you are covering the Spokane
16 district?

17 A Yes.

18 Q Tell me about the Spokane district. What discussions did
19 you have about that district?

20 A I took over for the Spokane district because the manager
21 had left. Initially I just had -- well, she split it up into
22 four different -- you have one big district, and then she split
23 it up into four different sections so that there were several
24 managers -- four managers -- and I was one of them. One of the
25 other district sales managers left in the meantime, so she gave

S. Ivie - D

1 that to me. So I covered half of that district and then two
2 other managers covered the other half.

3 So I took over that part. I thought it was the more
4 early June time frame, like early June. So we had that
5 discussion, in Spokane, because of the budget and the length
6 and the travel and everything, that I was to do field coaching
7 without customer engagement, so like on the phone and stuff. I
8 told her again, "Yeah, I do it all the time with my team. I
9 try to keep very close contact with them, and so I'm familiar
10 with it. It is as simple as that." She was like, "Great,
11 great. That's what you'll do with that. We need some
12 documentation." There were some problems there, and it needed
13 documentation for them.

14 Q Thank you. You can take this down.

15 So prior to your first written warning -- oh, I'm
16 sorry. So we talked about your performance reviews. In your
17 actual performance reviews, did it include the number of field
18 coaching days or like the number of in-the-field field coaching
19 days? Was that in your performance review?

20 A The one that she kind of showed me?

21 Q Or just in any of your performance reviews in the past?

22 A Yeah. There is just like a like saying, "Coaching days."

23 Q Total coaching days?

24 A Yes.

25 Q Is there any breakdown of like virtual versus in the

S. Ivie - D

1 field?

2 A No. It is just coaching days. It is strictly that. It
3 has never mattered.

4 Q So a total number of days is just in there?

5 A Yes.

6 Q So in your 19 years, did any of your subordinates raise
7 any concerns to you about how you coached them?

8 A No.

9 Q In your 19 years did any of your supervisors accuse you of
10 being subordinate or not following an AstraZeneca policy?

11 A No.

12 Q Okay. So going back to the meeting with Stephani and
13 Karen, they tell you about your coaching days?

14 A Right.

15 Q Did they talk about any discipline you might receive?

16 A They said they were going to think about it, and I would
17 possibly get a written warning.

18 Q What was your reaction to learning that you might get a
19 written warning?

20 A Once again, I'm absolutely -- I'm stunned. It came out of
21 nowhere. I was thinking -- here I was, like four weeks earlier
22 I'm talking to Karen Belknap and kind of guarding my heart on
23 illegal and unethical behaviors and retaliatory issues and
24 discrimination and telling her this, and the last thing they
25 said to me on the call is -- they said, "Oh, we are going to

S. Ivie - D

1 take this very seriously, and we're going to get back to you
2 soon."

3 So here I am four weeks later on this call thinking
4 that we're talking about this, and I totally felt blindsided.
5 So when they said "written warning," I'm blindsided again.
6 Here I am. I can't talk; I'm just stunned.

7 Q And so eventually you did get issued a written warning for
8 coaching?

9 A Yes.

10 Q And so once you received that, did you ask for a mutual
11 consent or a severance package?

12 A Yes.

13 Q Why did you do that?

14 A Because, once again, I could see the writing on the wall.
15 The tone from Stephani to me was frustration, anger. It wasn't
16 really good, not to mention getting a written warning. At
17 least Karen said, when she gave me the written warning, it will
18 stay throughout my entire employment. If I'm interviewed, it
19 will come up, and they will see it. So here I am. I'm
20 thinking I'm getting doing great, and I am starting to get
21 promotions, and I'm getting national exposure. Then I have
22 this on my record. There was nowhere else for me to go. And I
23 knew that it wasn't going to be good, and I am the primary -- I
24 am the primary source of income for my family, and so I just
25 wanted to see what was going to happen.

S. Ivie - D

1 Q And ultimately you decided not to accept the mutual
2 consent, right?

3 A No.

4 Q Why is that?

5 A Well, I loved my job, and I said, "Okay, I'm going to keep
6 doing it. I'm going to keep going on. This all will work
7 out." I'm going to do my very best to do whatever they needed
8 me to do, and that's kind of my whole thought process. I'm
9 willing to continue on. I'm going to do this. I'm going to do
10 what they want me to do.

11 Q And so shortly thereafter do you go on FMLA leave?

12 A I did.

13 Q Why did you go on FMLA leave?

14 A I was pretty emotional, and I have chronic migraines and
15 stress doesn't help with that. And I couldn't control it. It
16 was like one after another after another, and it was severe
17 anxiety when I would wake up in the morning and -- I just
18 couldn't function. I was a mess. That's it. That's what it
19 is.

20 Q So you go on FMLA leave. Then you return, right, kind of
21 in the April 2019 time frame?

22 A April 16th.

23 Q So tell me about when you return. Do you have any
24 meetings with anyone about what you're doing?

25 A Yeah. I had a meeting with Stephani right after that.

S. Ivie - D

1 Q And how did that meeting go?

2 A She was still unpleasant and very matter-of-fact. It was
3 just a very matter-of-fact meeting. This is how it is, and
4 that was it.

5 Q Did anything about your job duties change at all once you
6 came back from FMLA leave?

7 A She informed me that the policy for 150 coaching days was
8 now up to 160 coaching days. She told me she was going to have
9 to retrain me. She was going to have other district managers
10 do that. She told me that I had to report in every Monday on
11 who I was going to be calling on or who I was going to be
12 working with, like the sales representatives. So I had to
13 report that every Monday. What's the other? A whole bunch of
14 different things I was having to do with her.

15 Q Did you have to do any more training with anyone?

16 A Yeah. The district managers were going to train me on
17 like analytics, like different brand promotional pieces, how to
18 do district business plans, all of that stuff, like the basic
19 DSMs.

20 Q And were you able to like access all of your computer
21 systems when you came back from FMLA?

22 A No.

23 Q What weren't you able to access?

24 A I could access the email, like Outlook calendar invites,
25 but anything else, the CoachMe app. -- this is what you do your

S. Ivie - D

1 field coaching on; and your performance, like the data matrix.
2 We actually have data called Insights. Go figure. I couldn't
3 access that either.

4 Q And we talked a little bit about the coaching days -- like
5 the number of days that was increased from 150 to 160?

6 A Yes.

7 Q What about the split? Were you supposed to do 80/20
8 still? What were you required to do?

9 A No. I guess I lost that. So I had to do 100 percent --
10 everything -- in person.

11 Q Did anyone else have to do 100 percent in person?

12 A No.

13 Q When you came back on FMLA leave, were you on intermittent
14 FMLA leave?

15 A Yes. Uh-huh.

16 Q What does that mean?

17 A That means -- I think I had three days that if
18 something -- like if my migraine happened, I could take time
19 off for that. Basically it was that. It was around migraines
20 or any depression or anxiety that I was having. They thought
21 it was worthy of me to be able to say, "I can't travel this
22 day," or "I can't be in the field." That's what they wanted to
23 see.

24 Q And you submitted medical documentation to get your FMLA
25 approved?

S. Ivie - D

1 A It had to be approved, yes.

2 Q I know you were previously in some compliance and
3 developmental positions. Were you still in those positions
4 when you got back from leave?

5 A No.

6 Q Who told you that you no longer had those positions?

7 A Stephani did.

8 Q What did she say about it?

9 A She said that I will be taken off my activities and my
10 national leadership positions.

11 THE COURT: Ms. Chambers, let me hold for one moment.
12 I want to check in with the jury and Dennis, if you need or
13 want a morning recess. We can do that very quickly right now.

14 The court reporter is indicating, "Yes, please." So
15 we will take a very prompt 15-minute recess. We will get going
16 by 10 after 11:00 sharp. I have a noon matter I need to take
17 care of, so we need to recess pretty promptly at noon.

18 (Recess.)

19 (Open court; jury present:)

20 THE COURT: Ms. Chambers, continue, please.

21 MS. CHAMBERS: Thank you.

22 BY MS. CHAMBERS:

23 Q Suzanne, before the break, we were talking about your FMLA
24 leave, you come back from leave, and there were some changes to
25 your work requirements. So that was April 2019, right?

S. Ivie - D

1 A Yes.

2 Q So I want to move to May 2019. Specifically May 3rd,
3 2019. So at some point did Karen Belknap leave AstraZeneca?

4 A Yes.

5 Q And who took her role?

6 A It was Dawn Ceaser.

7 Q Did you have a call with Karen, Dawn, and you?

8 A Yes.

9 Q Okay. And so might it have been around that May 3rd,
10 2019, date?

11 A It was.

12 Q Take me to that phone call. Who initiates the call?

13 A I believe it was Karen Belknap. I believe she was the
14 one.

15 Q Did you know about anything that would happen prior to the
16 call?

17 A Well, not necessarily, but I was hopeful that it was going
18 to be talking about the issues that I had brought up.

19 Q So by that time, on May 3rd, 2019, did you know anything
20 about the status of the investigations into the complaints you
21 raised about off-label marketing and age discrimination?

22 A The final complaint?

23 Q Yes.

24 A I can't remember. I think it was on May 3rd that it was
25 going to be all unsubstantiated.

S. Ivie - D

1 Q So let's go to that phone call. It is you, Dawn Ceaser,
2 and Karen. Who talks first?

3 A I believe it was Karen.

4 Q What did she say?

5 A She said she wanted to follow up with me on the results of
6 everything and also to let me know that Dawn Ceaser is going to
7 take over.

8 Q And then who talks next?

9 A I think it was Karen Belknap.

10 Q What did she say?

11 A Just basically in one big word; that everything is
12 "unsubstantiated."

13 Q How are you feeling when you hear that?

14 A I was devastated. How could it be unsubstantiated? I
15 sent in the documents. How could it be? Once again, I am
16 stunned, shocked. I don't even know what the word is. I'm
17 totally shocked. I had documents.

18 Q Right. Then does Karen say anything else to you?

19 A That I need to move on and forget about the past; that
20 that would be best.

21 Q What are you thinking when she said that?

22 A Well, move on; forget about the past; everything is
23 unsubstantiated, I am now realizing HR is -- I think they're
24 threatening me: Move on; forget about the past; everything is
25 unsubstantiated. Those are the words that kept ringing through

S. Ivie - D

1 my mind.

2 Q Did Karen or Dawn say anything else on that call?

3 A Those were the words that ring in my mind.

4 Q Okay. So after -- did Karen say anything about if you had
5 any future complaints, what to do or any future concerns?

6 A Yes. I was to go to Stephani.

7 Q And what was your reaction to that?

8 A I was really devastated, because I can't go to Stephani.
9 Look at the problems we are having here, and I need help. I
10 need someone to, like, help me. I thought HR was there for me,
11 but they are not. I had to go to Stephani with any problems I
12 had -- whether it was off-label marketing, something illegal,
13 anything. It was just to go to Stephani's path only.

14 Q So after the call with HR -- actually let's take a look at
15 Plaintiff's Exhibit 46. Okay. So we talk about that meeting
16 with Karen and Dawn Ceaser on May 3rd, 2019. So I'm looking at
17 the email that you sent on May 16th, 2019. It is to
18 Teresa Grey and Mike Pomponi. The subject line says, "Request
19 for help."

20 Tell me, why did you send this email?

21 A So I had the call with HR earlier and things were still
22 not good. And I didn't know what else to do. So I sent a
23 message to Terry Grey. She is the Teresa Grey, the person in
24 compliance that I talked to about the insights in August.
25 That's the Teresa Grey. I talked to her. I sent an email to

S. Ivie - D

1 her and Mike Pomponi to say, "Is there anybody there? Can I be
2 helped with this? This isn't good. It is very volatile.
3 Stephani is not happy with me, and I'm being retaliated even
4 more."

5 Q And after you send this email, did Mike or Terry Grey
6 follow up with you at all?

7 A Mike sent a message -- I think it was above -- saying that
8 he will get back with me.

9 Q Did he get back with you?

10 A No.

11 Q All right. We can take that down. Thank you, Peter.

12 Now we are on the May 2019 time frame. So this is
13 about a month after you come back from FMLA leave. How are you
14 doing with your job? Are you able to perform your job?

15 A I was really trying. I'm locked out of the computer
16 system. I can't put field coaching reports in. I have limited
17 access to data. I'm trying to circle with my team. I have got
18 all of these extra things that Stephani is wanting me to do --
19 to coach to. I'm being left off of emails or text messages.
20 Two weeks I was left off text messages.

21 Q And how did you know you were being left off of text
22 messages?

23 A So in mid-May, we had a regional meeting. And this was
24 for all of the DSMs. They were on it and participating.
25 Stephani was the lead, since it was her region. The DSMs are

S. Ivie - D

1 kind of like the lead to or kind of the back-up. Then all of
2 the sales representatives from all of her entire region were
3 going to be on this call. It was four o'clock my time, and I
4 got on about 3:55. Everybody was on the call, like the DSMs
5 were all on the call. They were talking and doing business. I
6 thought, what in the world? I'm not late. I'm right here.
7 I'm like five minutes early.

8 So I'm just kind of listening, and they knew what
9 they were talking about. I said, "I apologize. I'm late."
10 And just they went on with their business. And I'm listening,
11 thinking, what in the world is going on? Then all the PSSs got
12 onto the call. So Stephani starts in with the presentation.
13 And all of a sudden, there are like cowbells and like
14 noisemakers, bells ringing, and everybody is going "yay, yay,"
15 kind of like a "rah-rah," and I'm sitting there going, what in
16 the world is going on? I'm trying to participate. And I'm
17 clapping and no clue with what's going on.

18 Then when they were doing my performance information,
19 people were doing their cowbells and their chimes and different
20 things, and I'm over here clapping, going what the heck is
21 going on? So on that call I'm completely lost -- again, I'm
22 clapping and everybody is doing stuff. I don't know what's
23 going on. And she's talking about the presentation.

24 After the call, I said to myself, I went through my
25 emails, there's nothing about being on this call early. So I'm

S. Ivie - D

1 thinking what could have happened? And it registered, going, I
2 haven't gotten a text message from her for a while. So I sent
3 a message to Andrew Maratas, who I think you have heard his
4 name before. I said, "Hey, did you get an email about this
5 teleconference that we were doing today?" He sent a message
6 back saying, "Yes." I said, "Could you send that to me?" So
7 he sends it to me. It said -- and I'm paraphrasing: Everybody
8 bring your cowbells. I don't want anyone clapping. I want
9 everyone to have noisemakers. Then she said "cowbells" again.
10 I thought to myself going: This is crazy. I don't just happen
11 to have a cowbell sitting in my office. I don't have a
12 noisemaker sitting in my office either. And in the message she
13 said, "I don't want anyone clapping." I was clapping. I
14 didn't have any cowbells or noisemakers, even though I was
15 supposed to. I could rub pens together. I don't know. Then I
16 realized -- I went back, and I hadn't been on a text message
17 for two weeks. I'm missing stuff.

18 Q And does your team usually communicate through text
19 message?

20 A Yes. Big time. I was so overwhelmed.

21 Q All right. Let's look at Plaintiff's Exhibit 61. This is
22 dated May 14th, 2018. This is an email from you to Stephani,
23 right?

24 A Yes.

25 Q And it is about a one-on-one meeting?

S. Ivie - D

1 A Yes.

2 Q And it says -- You say here on the second line, "I always
3 like to talk about my team performance. You and Karen gave me
4 my first warning. You told me that my No. 1 priority is
5 coaching/field time. With intense scrutiny and time in the
6 field, I've tried to make that a priority. If something has
7 changed, please let me know." Then at the end you say, "I'm
8 trying to do a great job and get all of the to-dos completed to
9 your satisfaction."

10 So during this time frame you are having one-on-one
11 meetings with Stephani?

12 A Yes.

13 Q Is your focus, once you get back from FMLA leave and you
14 have the first written warning, are you trying to increase your
15 in-person coaching?

16 A I am.

17 Q And you are now required to do that 100 percent of the
18 time?

19 A I am.

20 Q And you said that you are trying to complete all of her
21 tasks, right?

22 A Uh-huh.

23 Q So you were just trying to follow her instructions of what
24 she has laid out for you?

25 A Yes.

S. Ivie - D

1 Q And also is it around this time frame that -- I think you
2 mentioned this. I want to make sure I'm clear. You can't
3 access the coaching system and matrix?

4 A Yes.

5 Q And then you just talked about being left off of text
6 messages for two weeks?

7 A Yes.

8 Q And not being on some emails, right?

9 Okay. I think this came up in prior testimony,
10 something about you only sending one email in a seven-week time
11 frame. Is that accurate?

12 A No, because every Monday I would send an email to her
13 saying where I'm going to be.

14 Q Okay. And are you traveling more in this April/May time
15 frame than you had in the past?

16 A I'm traveling more, but I also have the intermittent
17 leave.

18 Q So you are either traveling or you are on intermittent
19 leave?

20 A Basically, yes.

21 Q Thank you. We can take that happen.

22 We talked what happened in May 2019. I want to talk
23 about June 6th, 2019. So do you have a phone call on that
24 date?

25 A I do.

S. Ivie - D

1 Q And who is on the call?

2 A It is Matt Gray, who was Stephani DiNunzio's fairly new
3 manager, and it was Dawn Ceaser.

4 Q Okay. And so you get on the call. Well, first, what did
5 you -- how is the call scheduled?

6 A It was Outlook.

7 Q What was the title of the call? Do you remember?

8 A I don't. It was something about performance or --

9 Q Okay.

10 A -- discussion. It was like a discussion, I think, maybe
11 what the title was.

12 Q Okay. So as you are getting ready for this call, how are
13 you feeling?

14 A Well, I was a bit nervous, but I figured that's what we
15 are going to be talking about. Now we are bringing Stephani's
16 manager into it, and maybe I could share with him some ideas.
17 I thought we were kind of bringing everybody together.

18 Q Okay. So who talks first?

19 A It was Dawn.

20 Q What does she say?

21 A She said that we've come to an impasse and our paths need
22 to go separate ways; that as of June 6th -- immediately -- I am
23 terminated.

24 Q What's running through your head at that point?

25 A I wasn't expecting it, again -- I wasn't expecting it. It

S. Ivie - D

1 was over.

2 Q Did anyone else talk on the call? Did she anything else
3 after that?

4 A She said I would be getting some things in the mail and
5 that I needed to return like the computer; that somebody was
6 going to pick up my car, and I need to do my final expense
7 report.

8 Q Did she give you a reason why you were terminated?

9 A Yes.

10 Q What did she say?

11 A Because I couldn't get on -- I couldn't get on and accept
12 unsubstantiated.

13 Q What do you think she was referring to there?

14 A And those weren't the exact words, but it was something
15 about I couldn't accept unsubstantiated. And I thought to
16 myself, well, all of these things have been a warning, that if
17 I didn't just accept it and do it and profits over people and
18 just let things ride, I'm no longer useful to the company. And
19 I was supposed to just accept that and just move on and forget
20 about the past. Everything is unsubstantiated. Don't raise
21 any more concerns. And I didn't do that, and so I'm
22 terminated.

23 Q Okay. Let's look at Plaintiff's Exhibit 67. I think
24 that's also in the juror notebook, the last page.

25 All right. Suzanne, I know you haven't seen this

S. Ivie - D

1 particular email. It is between HR people at AstraZeneca. But
2 I will note the second bullet point. It says, "Suzanne is not
3 accepting the results of the investigation that have occurred
4 and continues to raise similar complaints."

5 So is that similar to what Dawn Ceaser told you on
6 the call?

7 A Yeah. I just remember hearing "you didn't accept
8 unsubstantiated."

9 Q Okay. Was there any talk on the call about your coaching?

10 A No.

11 Q Okay. Was there any talk on the call about your first
12 written warning?

13 A I don't believe so.

14 Q All right.

15 Thank you, Peter.

16 After the termination call, how are you feeling?

17 A Again, I'm kind of going through the initial shock; oh,
18 no. I thought about my family. I called my husband and told
19 him, and he came home.

20 MS. RIECHERT: Objection. Hearsay.

21 MS. CHAMBERS: Judge, this is being offered about how
22 she feels in the moment; not that the statement is true.

23 MS. RIECHERT: She can say how she feels. She
24 doesn't have to say what she said.

25 THE COURT: Sustained. Rephrase your question.

S. Ivie - D

1 THE WITNESS: I was --

2 THE COURT: One moment. Let your lawyer rephrase.

3 THE WITNESS: I'm sorry.

4 BY MS. CHAMBERS:

5 Q So you are terminated. You talked about you called your
6 husband. You just mentioned you're the primary breadwinner of
7 your family, and so you are thinking about your family, right?

8 A Yes.

9 Q And you also mentioned you had migraines in the past,
10 right?

11 A Yes.

12 Q So just in terms of like your physical symptoms, how are
13 you feeling?

14 A Well, depression just notched up some more. Anxiety. I
15 could only imagine that I'm the primary caregiver to my
16 children and my family. I'm sitting in my kitchen looking at
17 my house and going: We've got the house; we've got my kids.
18 And no job.

19 Q So after you were terminated, did you look for other
20 employment since your termination?

21 A Yes.

22 Q Did you ultimately find other employment?

23 A Yes, I am currently employed.

24 Q When did you start that employment?

25 A It was -- it was either October or November of last year.

S. Ivie - D

1 Q And is it with another pharmaceutical company?

2 A No.

3 Q Is it similar-type job in terms of a district sales
4 manager?

5 A No.

6 Q Is it a full-time job?

7 A It is part-time.

8 Q Is the pay comparable?

9 A No.

10 Q And finally, Suzanne, what are you hoping to come out of
11 all of this?

12 A The whole reason I did this is because I thought I was
13 doing something right. You market pharmaceuticals. You ingest
14 them in your body literally, and it can really hurt people.
15 There has got to be an open dialogue when somebody has a
16 complaint, they shouldn't be retaliated against. You are
17 affecting lives. You are affecting lives. You have got to
18 have an open dialogue. And what happened to me can't happen
19 anymore. Policies need to be changed and I think focus on
20 people and not profits. And I'm okay with people making
21 profits but not over people's lives. It is just that. That's
22 what it is.

23 MS. CHAMBERS: Thank you. No further questions.

24 THE COURT: Thank you.

25 Cross, please.

S. Ivie - X

1 CROSS-EXAMINATION

2 BY MS. RIECHERT:

3 Q I would like to start about asking you some questions
4 about your age discrimination claim?

5 A Okay.

6 Q So let's start with the "Benatar" nickname. One of the
7 reasons that you believed that Ms. DiNunzio discriminated
8 against you because of your age was because she gave up the
9 "Benatar" nickname; is that correct?

10 A That was one component.

11 Q And that was the reference to the famous singer
12 Pat Benatar, right?

13 A Yes.

14 Q One of the big hits being *Hit Me With Your Best Shot*?

15 A Yes.

16 Q Now, Ms. DiNunzio asked the whole team, all of the DSMs,
17 to submit a photo of themselves when they were younger for a
18 team building event, is that correct?

19 A Yes.

20 Q And that was in early 2018?

21 A Yes.

22 Q Early 2018; is that correct? That was shortly after
23 Ms. DiNunzio became your manager, wasn't it?

24 A It was.

25 Q And you submitted two photos; is that correct?

S. Ivie - X

1 A Yes.

2 Q And one of them was yourself in the Utah and national
3 team?

4 A Yes.

5 Q Was that a beauty contest?

6 A Yes.

7 Q Then the other photo that you submitted is Exhibit 533,
8 which we hope we are going to get in front of us in a second.
9 I think it is the photo we have seen before in connection with
10 this case.

11 A Yes.

12 Q And the middle person on that photo of the exhibit is you;
13 isn't that correct?

14 A Yes.

15 Q And you submitted that to Ms. DiNunzio, correct?

16 A Yes.

17 Q And you understood she would be sharing the photo with the
18 team, didn't you?

19 A Yes.

20 Q All right. So now let's turn to some of the text messages
21 that you sent and received. There we go. There is the photo,
22 Exhibit 533.

23 So now let's turn to some of the text messages.

24 Let's look at Exhibit 539. Let's look at 848 to 849. This is
25 in January 2018, correct?

S. Ivie - X

1 A Yes.

2 Q Correct?

3 A Yes.

4 Q And Stephani DiNunzio was known as Stephani Orgren then;
5 is that correct?

6 A Yes.

7 Q Did she send you the text message that's at the top here:
8 "Hi, having a great day with Aaron. We have a very important
9 question. Which is your favorite? Benatar, Nicks, Joplin,
10 Jett?" She sent that to you, right?

11 A Yes.

12 Q And then you write "Wow" -- three exclamation points --
13 "how do you choose? Benatar, *Hit Me With Your Best Shot*," and
14 then going down through the rest of the text; is that correct?

15 A Yes.

16 Q Let's look now at line 851. It asks you, "How do you feel
17 about the 'Benatar' nickname?" And then on 853 you respond --
18 the first one was from Ms. DiNunzio, right, asking you how you
19 felt about the "Benatar" nickname, correct?

20 A Yes.

21 Q And then 853 is your response, and it says "LOL." Is that
22 laughing out loud?

23 A Laughing out loud.

24 Q Then you write, "*Hit Me With Your Best Shot*," referencing
25 Pat Benatar's name, right?

S. Ivie - X

1 A Yes.

2 Q "Bring it on." Then there is a number of exclamation
3 points, and I'm not sure what the rest are. That's a text that
4 you sent back to Ms. DiNunzio; is that correct?

5 A Yes.

6 Q Then let's look at 858 to 862. Ms. DiNunzio writes, "On a
7 another note, we have a nickname for Suzanne."

8 Is that where she is sending that to the team or to
9 you?

10 A I believe so.

11 Q Then the next one, "Any guesses? I'll give you a hint,
12 and then you can *Hit Me With Your Best Shot*. That's actually
13 the hint."

14 Then the next message is, "Yes, Suzanne is Benatar."

15 Then the last one says, "She rocks and so does
16 Suzanne. I have one for Genie too, but I need to run it by
17 her. I'm not sure if I will get a sign-off."

18 Then let's look at 865. Is this a text that you sent
19 back to Ms. DiNunzio?

20 A Yes.

21 Q And the "liked" refers to Ms. DiNunzio liking your text,
22 right?

23 A Yes.

24 Q But you wrote, "This is kewl. So funny. Love my new
25 nickname. Can I get it on the company license plate?"

S. Ivie - X

1 Is that correct?

2 A Yes.

3 Q And then 239, is this a text that you sent to the team?

4 A Yes.

5 Q It says, "Oh, wow. Chris, I forgot about that video. I
6 remember watching that on MTV over and over again. I'm working
7 on a Benatar play list. Guess you all know what I'm listening
8 to today."

9 That was January 2018, correct?

10 A Yes.

11 Q Now, Ms. DiNunzio never referred to Pat Benatar's age, did
12 she?

13 A No.

14 Q And you were trained that if you believed that if you had
15 been subjected to age discrimination, that you were required to
16 report, by company policy, to human resources or the company's
17 hotline right away. You understood that, didn't you?

18 A Yes.

19 Q But you didn't report that comment until -- that nickname
20 until 16 months after these text messages, did you?

21 A No. I tried to address it with her.

22 Q So you didn't report it until May of 2019, correct?

23 A I believe I addressed it in December.

24 Q I think if you look back at that, you will see it was not
25 referenced in December. It wasn't until May 2019. The only

S. Ivie - X

1 one that was referenced in December was the "wrinkles" one, I
2 think, maybe not even that.

3 A All right. But I referred to Benatar as well.

4 Q No. The only that one mentioned in December was "old
5 pharma" and "new pharma."

6 A Okay.

7 Q "Wrinkles" came up in May; "Pat Benatar" came up in May.

8 A Okay.

9 Q So you didn't reference the "Pat Benatar" or the
10 "wrinkles" comment until after you have notified that you were
11 getting a bad review from Ms. DiNunzio, right?

12 A I don't think I wrote it. I did talk with her about it.

13 Q But you didn't complain about it through human resources
14 or the hotline or anybody else until after you got the bad
15 review from -- after you were notified you were getting a bad
16 review from Ms. DiNunzio, correct?

17 A Yes.

18 Q And after you got the written warning, correct?

19 A Yes.

20 Q Now, you had already complained about age discrimination
21 in your December 2018 EthicsPoint complaint, hadn't you?

22 A Yes.

23 Q And that's the one where you mentioned the "old
24 pharma/new pharma," correct?

25 A Yes.

S. Ivie - X

1 Q But you didn't mention the "Benatar" nickname, correct?

2 A For some reason I thought I did, but no.

3 Q So it was over five months after your December
4 EthicsPoint; 16 months after you got the nickname that you
5 first complained to HR about the "Benatar" nickname, correct?

6 A Yes.

7 Q Now, let's look at another text message that you sent,
8 Exhibit 737 -- Exhibit 540, line 737. This is a text message
9 that you sent, correct?

10 A I did.

11 Q You said -- this is to Aaron Griffith, correct?

12 A Yes.

13 Q And he is one of the acting DSMs or the DSM?

14 A Yes.

15 Q At this time he was one of your subordinates, correct --

16 A Yes.

17 Q -- you said?

18 You said, "The DSMs have decided that your nickname
19 should be Kelpto. I think you can thank Genie for that name."

20 Is that a text that you sent to your subordinate?

21 A Yes.

22 Q Now, you say now it would be more professional to use
23 someone's actual name rather than a nickname, correct?

24 A Yes.

25 Q But then in this text you tell Mr. Griffith that his

S. Ivie - X

1 nickname was "Kelpto," didn't you?

2 A I told him that the DSMs -- which was not me -- I think it
3 was at a meeting prior, and they said that Suzanne said his
4 name was Kelpto. And I have no idea what that means. So I was
5 letting him know.

6 Q You were telling your subordinate that he also had a
7 nickname, correct?

8 A It wasn't from me, but yes.

9 Q Even though you felt it was more professional not to have
10 nicknames but to use people's actual names?

11 A Yes.

12 Q You didn't ask him if he wanted a nickname assigned to him
13 before sending him this text, did you?

14 A I didn't know he was given a name at this particular
15 meeting. So I was letting him know, but, no, I didn't say, "Do
16 you want the nickname?"

17 Q There were other DSMs on the team who called you
18 "Benatar," correct?

19 A Yes.

20 Q Did you think they were discriminating against you based
21 on your age when they did that?

22 A There were a couple of times, yes. I think they were
23 necessarily -- well, Pat Benatar, people know that she is '60s,
24 '70s, maybe '80s stuff. So Pat Benatar is Pat Benatar, and you
25 know that she is in that era.

S. Ivie - X

1 Q The question is: You didn't think that the other DSMs
2 were discriminating against you based on your age when they
3 called you "Benatar," correct?

4 A It was after Pat Benatar, and so I would say yes.

5 Q So you thought the other DSMs were also discriminating
6 against you based on your age?

7 A I think they were following Stephani's lead. Does that
8 help?

9 Q But the question was whether you thought they were also
10 discriminating against you based on your age?

11 A Not necessarily, no.

12 Q Just Ms. DiNunzio?

13 A She was encouraging that, yes.

14 Q Let's turn to what I'm calling the "wrinkles" comment,
15 which is actually the "lack of wrinkles" comment. You claim
16 that Ms. DiNunzio made another comment about the fact that you
17 didn't have wrinkles, correct?

18 A Yes.

19 Q And she made that comment in April of 2018?

20 A Yes.

21 Q Isn't that correct?

22 But you didn't report that comment until May 2019, 13
23 months later; is that correct?

24 A Yes. I tried to address it with her.

25 Q And you didn't address -- you didn't complain to human

S. Ivie - X

1 resources about the "wrinkles" comment until after you had
2 received notice that you were going to get a bad review; is
3 that correct?

4 A It was after that date.

5 Q And after you got the written warning, correct?

6 A Yes.

7 Q And when you made your complaint in December of 2018, you
8 didn't mention the wrinkles comment, correct?

9 A I thought I did, but no.

10 Q Even though it had been made several months earlier?

11 A Yes.

12 Q Okay. We are going to change topics and talk about
13 coaching expectations for DSMs like yourself.

14 In front of you you have Exhibit No. 522. This was
15 an email that was sent to you by Ms. DiNunzio and the other
16 DSMs, correct?

17 A Yes.

18 Q And one of the documents that is attached, you'll see at
19 the top, says "FAQ time allocation," and then it has a date
20 from 2017, 6-19-17, correct?

21 A Yes.

22 Q Isn't it true that on April 8th, 2018 -- April 4th, 2018,
23 you received this email telling you about the obligation to be
24 in the field 150 days a year. This is the document in front of
25 you that was attached to that email. So the question is:

S. Ivie - X

1 On April 4th, 2018, you received an email with this attachment,
2 telling you about your obligation to be in the field 150 days a
3 year, correct?

4 A Yes.

5 Q And the attachment also says -- well, you were in the
6 respiratory group, and that's why it was 150 days, correct?

7 A Yes.

8 Q And then it talks about coaching him with customer
9 engagement and coaching without customer engagement, right?

10 A Yes.

11 Q And it says that coaching with customer engagement, you're
12 supposed to use when you are in the field with the sales
13 specialist making calls on targeted health care professionals,
14 correct?

15 A Yes.

16 Q And coaching without customer engagement is when you are
17 not in the field with the pharmaceutical sales representative,
18 correct?

19 A Yes.

20 Q And then at the end of the document, No. 3 -- sorry -- it
21 says, "What percentage of our total coaching days should be
22 under the new category, coaching without customer engagement?"

23 "ANSWER: Coaching without customer engagement and
24 business development both count towards total coaching days,
25 but combined they should not equal more than 20 percent of your

S. Ivie - X

1 total coaching days."

2 That's what that attachment to this email you
3 received said, correct?

4 A Yes.

5 Q So than meant you had to be out of your home, coaching
6 your team in the field, 80 percent or more of the time,
7 correct?

8 A Yes.

9 Q You didn't coach 80 percent of your time with customer
10 engagement, did you?

11 A No.

12 Q You said you thought it was a recommendation. No one ever
13 told you that the 80/20 standard was only a recommendation, did
14 they?

15 A No.

16 Q You had been told to spend 150 days coaching your team
17 with customer engagement. You understood that, right?

18 A Yes.

19 Q That wasn't a recommendation, was it?

20 A It was not my understanding it was a policy.

21 Q But it wasn't a recommendation, was it? It was a
22 requirement?

23 A I'm not sure if I would say "a requirement."

24 Q There is nothing in this document that suggests that the
25 150 days was a recommendation, is there? We will get back to

S. Ivie - X

1 it. There is nothing in this document that suggests that the
2 150 days was a recommendation, correct?

3 A No.

4 Q There is nothing in this document that suggests that the
5 80 percent was a recommendation, is there?

6 A No.

7 Q And so you ignored the expectation that 80 percent of the
8 coaching days on your team should be with customer engagement;
9 isn't that true?

10 A Yes.

11 Q So you would agree with me that you did not spend
12 80 percent of your coaching time with customer engagement and
13 therefore you were not following what this document said?

14 A Yes.

15 Q Now, let's turn to May 2018, the next month. Looking at
16 Exhibit 520, is this an email that you and the other DSMs
17 received from Ms. DiNunzio about the 80/20 rule?

18 A Yes.

19 Q Again, it says that coaching with customer engagement
20 should account for 80 percent of your coaching days. If you
21 could look at that second bullet.

22 A Yes.

23 Q And then it says, "Please review the attachments at the
24 bottom and ensure that your time reflects the 80/20 split going
25 forward," correct?

S. Ivie - X

1 A Yes.

2 Q You were told to read it carefully, right?

3 A I believe that's what it said on the end, yes.

4 Q And you did read it carefully, didn't you?

5 A I did read it, yes.

6 Q And still you didn't spend 80 percent of your coaching
7 time coaching with customer engagement, correct?

8 A No.

9 Q Now, Ms. DiNunzio told you in mid-2018 that the 80/20 rule
10 was more than a recommendation, didn't she?

11 A What was the date that you said?

12 Q Mid-2018, so around June 2018.

13 A Yes, we had a discussion.

14 Q And she told you it was a requirement, correct?

15 A We talked about that, yes.

16 Q You understood it was a job requirement to observe
17 interactions between, for example, the Boise reps and the
18 healthcare professionals, didn't you?

19 A Yes. But there was more to that conversation.

20 Q Let's turn to June 2018, Exhibit 504. These are the notes
21 that Ms. DiNunzio says she made of that meeting with you. Do
22 you know agree that this is what was discussed during that
23 meeting?

24 A That was some of it.

25 Q She says at the bottom here, "I asked if she" -- that's

S. Ivie - X

1 you -- "uses field coaching reports" -- FCRs -- "to capture
2 distance coaching discussions." She said, "Yes." That means
3 you told her yes. I asked her to refrain from doing so,
4 meaning that Ms. DiNunzio told you don't use FCRs to capture
5 distance field coaching reports. And she says, "I asked her to
6 refrain from doing so. The FCRs shouldn't be used to summarize
7 a brief conversation. I said that Spokane can be the
8 exception."

9 So you understood that as of June 2018 that you were
10 not to capture field coaching reports -- not to use distance
11 coaching discussions on field coaching reports except for
12 Spokane, right?

13 A Yes. But there was more to that.

14 Q Now, Spokane, you were given part of that territory for a
15 period of time in mid-2018 because the DSM left, correct?

16 A Yes.

17 Q And you had that for, what, a couple of months?

18 A Yes.

19 Q And Ms. DiNunzio specifically told you that for Spokane
20 you did not have to go to Spokane. You could do the field
21 coaching distantly and report it that way, correct?

22 A Yes.

23 Q But she never told you you could be distant for Utah, did
24 she; that you could do those from your home?

25 A We did have a discussion.

S. Ivie - X

1 Q And what about Boise?

2 A I believe so, yes.

3 Q Well, I'm sure you can tell us about that.

4 All right. Let's go to September 2018. You were
5 again told you needed to be in the field 150 days a year,
6 correct?

7 A Yes. It was at a district -- regional meeting.

8 Q And 80 percent of that time had to be with customer
9 engagement?

10 A Yes.

11 MS. RIECHERT: This is a good time for a break,
12 Your Honor.

13 THE COURT: Thank you.

14 Members of the jury, we will recess for our lunch
15 recess. I ask that you be prepared to be back in the box at
16 one o'clock promptly. We will begin at one o'clock with a
17 video witness.

18 One other piece of news, the lawyers and the Court
19 really have been working diligently to move this case along as
20 quickly as we can, but I wanted to give you as much notice as
21 possible that we will in fact require your service on Monday,
22 for your planning and scheduling purposes.

23 Thank you very much.

24 (Recess.)

25

S. Ivie - X

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(Afternoon session; open court; jury present:)

THE COURT: Ladies and gentlemen, before we get started this afternoon, we were just informed that the President is signing into law today the new federal holiday of Juneteenth. That holiday this year will fall on Saturday, which means that it will be recognized, celebrated tomorrow, June 18th. However, due to the exceedingly late notice that we all have received about this new holiday, the judges are being given discretion to continue proceedings that have already been scheduled.

So I wanted to let you know that I am certainly going to exercise my discretion to hold trial tomorrow, Friday, June 18th. So when you go home and see on your news or phones that there is a federal holiday and buildings are closed, and we won't be getting mail, know that this courthouse, the Hatfield Courthouse, will remain open just like today, and you are expected and appreciated to appear tomorrow.

Thank you very much.

Mr. Oswald.

MR. OSWALD: Thank you.

THE COURT: We need to swear the witness, please.

THE CLERK: Ms. McCullough, this is the clerk, would you please raise your right hand, please.

(The witness was duly sworn and testified via video conference.)

B. McCullough - D

1 THE CLERK: Thank you. Would you please state your
2 name for the record, spelling your last.

3 THE WITNESS: Sure. My name is Barbara Jean
4 McCullough, M-c-C-U-L-L-O-U-G-H.

5 DIRECT EXAMINATION

6 BY MR. OSWALD:

7 Q Ms. McCullough, hello.

8 A Hello.

9 Q I'm Scott Oswald, and I represent Suzanne Ivie. Thank you
10 for joining us today.

11 A You're welcome.

12 Q Ms. McCullough, you are AstraZeneca's vice president of
13 compliance for North America, right?

14 A Actually I'm vice president for compliance for the BPBU,
15 the Bio-Pharmaceutical Business Unit in the U.S.

16 Q I understand. And you have worked at AstraZeneca since
17 2005?

18 A Correct.

19 Q Your responsibilities include leading AstraZeneca's
20 compliance program in the Bio-Pharma Business Unit across the
21 United States?

22 A Correct.

23 Q And you serve as a member of AstraZeneca's U.S. leadership
24 team as a whole, right?

25 A That is correct.

B. McCullough - D

1 Q When it comes to compliance in the United States, in the
2 Bio-Pharma Business Unit, the buck stops with you?

3 A From a bio-pharma perspective, yes. There are other
4 individuals, and there is another individual in the U.S. that I
5 report to who is the higher-ranking compliance individual.

6 Q You are familiar with AstraZeneca's U.S. compliance
7 program?

8 A Absolutely.

9 Q And you are familiar with its key objectives?

10 A Absolutely.

11 Q Its first key objective is exercising due diligence to
12 prevent, detect, and correct unlawful conduct?

13 A Yes.

14 Q Marketing for an unapproved use off-label is a violation
15 of AstraZeneca's code of conduct?

16 A Yes. As outlined in the policy, yes.

17 Q And so is retaliation?

18 A Yes.

19 Q The United States compliance program includes eight
20 elements, right?

21 A Yes.

22 Q One of those elements is the lines of communication,
23 right?

24 A Yes. I thought you were stating a fact. I'm sorry.

25 Q Under that element, AstraZeneca expects its employees to

B. McCullough - D

1 report actual or even suspected policy violations, right?

2 A Definitely.

3 Q In essence, if they see something, to say something?

4 A Yes.

5 Q The reasons for this include to ensure that AstraZeneca
6 complies with the law?

7 A Correct.

8 Q To protect AstraZeneca's representation?

9 A Yes.

10 Q To protect AstraZeneca's patients?

11 A Correct.

12 Q To protect AstraZeneca's employees?

13 A Overall, yes, I agree.

14 Q So that AstraZeneca can correct any violation and prevent
15 it from happening again?

16 A Yes.

17 Q Each AstraZeneca employee shares in this responsibility?

18 A I would agree with that; it falls under our speak-up
19 culture.

20 Q To ensure that AstraZeneca's policies are being followed?

21 A Yes.

22 Q And that AstraZeneca standards of conduct are met?

23 A I would agree.

24 Q In every case it is critically important for AstraZeneca
25 that its employees raise any compliance concerns, right?

B. McCullough - D

1 A It is important that they raise compliance concerns.
2 However, our speak-up program is larger than just compliance.
3 If there is other behavior or ideas they have, that's all
4 encouraged through the culture that we embrace.

5 Q And in every case it is critically important for
6 AstraZeneca that its employee raise any compliance concerns,
7 right?

8 A Absolutely.

9 Q AstraZeneca provides several options for employees seeking
10 guidance or raising concerns, right?

11 A We do.

12 Q AstraZeneca enforces a no retaliation policy?

13 A Absolutely.

14 Q Employees should not fear retaliation?

15 A Correct.

16 Q Of any kind? Of any kind?

17 A Correct.

18 Q You agree that AstraZeneca must protect its employees from
19 retaliation when they report in good faith concerns about the
20 company marketing its drugs for unapproved uses, right?

21 A I do.

22 Q AstraZeneca employees may bring their concern to their
23 manager?

24 A Yes.

25 Q Or to human resources?

B. McCullough - D

1 A Can you repeat that? It cut out. I'm sorry.

2 Q Or to human resources?

3 A Correct.

4 Q Or to compliance?

5 A Correct.

6 Q AstraZeneca employees may raise their concerns by using
7 the code of conduct help line?

8 A Correct. They can do it anonymously, they can do it.
9 Whatever they are comfortable with.

10 Q Or by using the code of conduct website?

11 A Uh-huh.

12 Q Is that a yes?

13 A Yes.

14 Q Now, you are the vice president of compliance for the
15 Bio-Pharma Business Unit for the United States. When it comes
16 to compliance in the United States for the Bio-Pharma Business
17 Unit, the buck stops with you?

18 A Yes. However, there is a higher-ranking individual within
19 the U.S. that covers both bio-pharma and narcology. I don't
20 know that that makes a difference, but I want to be fully
21 factual.

22 Q I understand. AstraZeneca has developed a vaccine for
23 COVID-19, right?

24 A Correct.

25 Q AstraZeneca intends for its vaccine to be approved for use

B. McCullough - D

1 in the United States, right?

2 A At some point. That's the hope.

3 Q AstraZeneca enforces compliance through documents like its
4 U.S. compliance program policy, right?

5 A Yes. Any product we promote in the U.S. has to fall under
6 the U.S. policy that we have in place.

7 Q The U.S. compliance program establishes compliance rules
8 for all of AstraZeneca's drugs, right?

9 A Correct.

10 Q Including the COVID-19 vaccine?

11 A Yes. When it is approved, yes.

12 Q Now I want to turn to June of 2019 for a moment.

13 A Okay.

14 Q In June of 2019, you exchanged a series of emails with
15 Amy Welch and Dawn Ceaser, among others, right?

16 A Yes.

17 Q You were concerned about the appearance that AstraZeneca
18 fired Suzanne Ivie for retaliatory reasons, right?

19 A I was seeking information about the status of that
20 investigation when I reached out to Amy via email.

21 Q You were concerned about the possibility of the appearance
22 that AstraZeneca fired Suzanne for retaliatory reasons because
23 she had raised multiple compliance complaints, right?

24 A No. I did not think -- I think there are two separate
25 issues here. Reaching out to Amy to identify what the current

B. McCullough - D

1 status was for that case -- so proceed.

2 Q The current status of Suzanne Ivie's case against
3 Stephani DiNunzio, right?

4 A Correct.

5 Q You were concerned that Suzanne's firing could be
6 considered retaliatory because of AstraZeneca's inconsistent
7 enforcement of its 80/20 policy, right?

8 A Not entirely.

9 Q All right. Let's take a look at Plaintiff's Exhibit
10 No. 58, if we could, for a moment.

11 A Okay.

12 Q It should appear on your screen momentarily.

13 A Okay.

14 Q All right. Now, I want to turn to page 3 of this
15 document. Do you recognize this document?

16 A I do.

17 Q And this document is dated Monday, June 10th, 2019, right?

18 A Yes.

19 Q And it is from you to Amy Welch?

20 A Correct.

21 Q Okay. And let's go down to the third paragraph. My
22 understanding -- and by the way, this is an email that is in
23 the wake of Suzanne Ivie's firing, right?

24 A Yes. From a time perspective, I don't know exactly when
25 the decision was made to terminate Suzanne. There were

B. McCullough - D

1 multiple things happening all in and around the same time
2 frame.

3 Q So this is occurring on June 10th, and Suzanne Ivie was
4 fired on June 6th of 2019, right?

5 A I don't know the exact date. I trust if that's what you
6 are telling me, that's the date, if you have that in the
7 record, but I don't know the exact date.

8 Q I understand.

9 So the third paragraph: "My understanding of facts
10 was that we did not want potential appearance that this DSM" --
11 and "this DSM" is referring to Suzanne Ivie, right?

12 A Correct.

13 Q "Was being terminated for retaliatory reasons because she
14 had raised multiple HR complaints, especially because Ivie
15 raised two different sets of complaints against the CBD
16 DiNunzio (one case investigated by HR months ago and
17 unsubstantiated; then another set of complaints found to be
18 unsubstantiated). However, that CBD did receive coaching,
19 because CBD was using nicknames with her team and not all
20 employees were comfortable with."

21 Did I read that correctly?

22 A Correct. Yes.

23 Q Now, you were concerned, were you not, that Suzanne's
24 firing could be considered retaliatory because AstraZeneca had
25 inconsistently enforced the 80/20 policy, right?

B. McCullough - D

1 A No, that is not accurate. I was -- I was concerned
2 because, from a timing perspective, we had just conducted two
3 independent compliance allegations that were brought forth by
4 Suzanne. They were unsubstantiated. Separately, the
5 performance issue was being addressed at the same time by HR.
6 So from a perception, it could -- if someone were looking from
7 the outside, it could give the perception that it was for that
8 reason. It absolutely was not for that reason. There is no
9 retaliation there. But it could give the appearance, from a
10 timing perspective, they were happening fairly close to one
11 another, maybe three to four months apart, something like that.

12 Q And that concerned you, right?

13 A That would always concern me, yes.

14 Q In fact, the concern was the same person that was
15 investigating Suzanne's complaints about the fact that her
16 supervisor was encouraging she and the other subordinates to
17 engage in off-label marketing, that that complaint was being
18 investigated by the same person at the very same time that the
19 same person is investigating Suzanne, and that concerned you?

20 A I wouldn't say I was concerned. I was very interested in
21 the facts; that we were being fair and objective with everyone.
22 I wouldn't say I was openly concerned, because I trust that
23 investigations are always conducted in a fair and equitable
24 manner.

25 Q But it bothered you, though, that the same person

B. McCullough - D

1 investigating Suzanne's complaints was also investigating
2 Suzanne simultaneously?

3 A Who are you referring to here? There were multiple
4 investigators that were involved. There were HR investigators
5 and then a compliance investigator as well.

6 Q I'm just saying to you that you were concerned that the
7 very same person investigating Suzanne's complaints was
8 simultaneously investigating Suzanne at the same time, and that
9 concerned you?

10 A Can you answer who you are referring to when you say "you
11 were investigating"? We had multiple people involved in the
12 investigation.

13 Q Karen Belknap.

14 A Okay. No, I would not have been concerned about that. I
15 didn't have much interaction with Karen Belknap at all.

16 Q In fact, you are not concerned at all about the fact that
17 the same person that is investigating Suzanne's complaints is
18 investigating her simultaneously. That doesn't bother you?

19 MR. MCCARTHY: Objection. Asked and answered.

20 THE COURT: Please rephrase, sir.

21 BY MR. OSWALD:

22 Q Well, I want to understand what your position is. In
23 fact, you're not concerned about the fact that the very same
24 person who is investigating Suzanne's complaints was
25 investigating Suzanne at the same time?

B. McCullough - D

1 MR. MCCARTHY: Same objection.

2 THE COURT: Sustained. Move on, please, Mr. Oswald.

3 BY MR. OSWALD:

4 Q Ms. McCullough, there wasn't a clear standard communicated
5 until April of 2019, right?

6 A That's not correct. There had been a standard. There had
7 always been a standard of 80/20 out in the field. 80 percent
8 of the time managers have to be working with their sales
9 representatives; filling out coaching forms. 20 percent of the
10 time, they can have an administrative day, say on a Friday, to
11 approve expense reports, go through reports, read through
12 clinical reprints and things like that just to keep their
13 acumen up, but that had been in place for many, many years.

14 We reinforced in April 2019, the date you are
15 referring to. We reinforced that they need to fill out -- they
16 are called field coaching forms. They are forms that ask about
17 driver safety, about appropriate promotion, that type of thing.
18 That's what we were reminding the managers to do, because they
19 weren't all filling out their forms.

20 Q Let's look at the same email here right below the previous
21 paragraph. "In April 2019, we sent clear guidance to the field
22 sales organization so that all DSMs are clear on expectations,
23 meaning we have level-set expectations."

24 Did I read that correctly?

25 A Yes.

B. McCullough - D

1 Q Now, what you were concerned about was that there would be
2 an appearance of retaliation in response to Suzanne Ivie --
3 what she disclosed in December 19th, 2018.

4 You were concerned that there would be an appearance
5 of retaliation in response to what Suzanne disclosed on
6 December 19th of 2018, right?

7 MR. McCARTHY: Objection. Asked and answered.

8 THE COURT: One moment. Sustained. Move on, please.

9 BY MR. OSWALD:

10 Q Ms. McCullough, I want to take a look at Plaintiff's
11 Exhibit No. 87.

12 A Okay.

13 Q Now, this is an email from -- first off, what is this
14 document?

15 A I haven't seen this in years, so let me look at it. Hold
16 on.

17 So this is essentially -- Mike Pomponi is a local
18 investigator in the U.S. This is essentially summarizing that
19 GCI that he is involved with. Our global compliance team sits
20 in a different area, but they get involved in some of the local
21 investigation that meets certain criteria.

22 Q The reason that this met that criteria is because it was a
23 significant case?

24 A The reason it met that criteria is basically around No. 3,
25 if there's potential encouragement to use an unapproved

B. McCullough - D

1 statement in production, then that automatically triggers that
2 our global compliance investigation team will partner with us
3 locally to be able to conduct the investigation.

4 Q Okay.

5 A So it is very typical. We do this to have another set of
6 eyes on it and help with the investigation itself.

7 Q And it says here, "Please let Madalina know after you have
8 notified Ruud and Mina." Who are Ruud and Mina?

9 A So Ruud Dobber is the head of the BioPharmaceuticals
10 Business Unit, and Mina is the therapeutic area vice president
11 for the respiratory products. So they are part of the U.S.
12 sales team that I am part of.

13 Q Okay. Ruud is the top dog of his business unit, right?

14 A I wouldn't call him a "dog," but he is the senior leader
15 in bio-pharma.

16 Q I got it. By the way, you did notify Ruud and Mina,
17 right?

18 A Yes. The date is very typical, but I would update them on
19 occasion on what cases that were going on. I don't know the
20 exact date that I notified them, but yes.

21 Q All right. Now, let's look at No. 3 for a minute. You
22 mentioned that's what triggered this significant case
23 designation. When you read this, and it said, "When the DSM
24 asks the CBD what source of the information was, the CBD told
25 the DSM to 'Google it.'"

B. McCullough - D

1 What was your reaction to this?

2 A That's not a typical response.

3 Q Anything else?

4 A No.

5 Q Did it concern you?

6 A It was an allegation at the time. I didn't know if there
7 was merit to it. So yes, I think the average person would be
8 concerned to Google it.

9 Q But you're not the average person. I mean, the buck stops
10 with you, at least in the BioPharma Business Unit on
11 compliance.

12 MR. McCARTHY: Objection, Your Honor. Is that a
13 question?

14 BY MR. OSWALD:

15 Q Did this concern you?

16 A I didn't catch the last part. Sorry.

17 Q Did it concern you?

18 MR. McCARTHY: Asked and answered.

19 THE COURT: Go ahead and answer, please, ma'am.

20 THE WITNESS: We take any allegation very seriously.
21 We absolutely investigate anything that comes in. And yes,
22 this absolutely met the criteria of something that we wanted to
23 investigate and also partnered with GCI to investigate it.

24 BY MR. OSWALD:

25 Q My question is a little bit different. Did it concern

B. McCullough - D

1 you?

2 A Yes. If someone said "Google it," and that were
3 substantiated, yes, that would concern me.

4 Q Why?

5 A Because all of our information regarding products is
6 passed up -- studies and clinical trials and information are --
7 instead of Googling.

8 Q What are the implications of Googling it and getting it
9 wrong?

10 A I don't know that I have an exact answer to that,
11 because it would have to be very specific to this statement and
12 what would come up on Google. I don't know that I can answer
13 that.

14 Q Is it possible that the sales representative could Google
15 it and come up with the wrong information?

16 MR. MCCARTHY: Objection. Calls for speculation.

17 THE COURT: Sustained.

18 BY MR. OSWALD:

19 Q So Suzanne disclosed that Stephani DiNunzio, Suzanne's CBD
20 and direct manager, had encouraged off-label marketing from
21 DiNunzio's subordinates, right?

22 A Can you restate that -- the last part -- from her
23 subordinates?

24 Q Well, the people who reported to her.

25 A I think that was the allegation, yes.

B. McCullough - D

1 Q And Suzanne disclosed that she believed that
2 Stephani DiNunzio was discriminating against Suzanne because of
3 her age, right?

4 A I think that was the allegation, yes.

5 Q Now, Suzanne brought these concerns to compliance, right?

6 A Suzanne reached out to compliance, I know, with some
7 questions at one point around -- actually not to me directly
8 but someone on my team -- something about whether or not
9 certain statements or opening statements would be appropriate.
10 So I know that they had some conversations, and she also
11 brought -- yeah, I believe this is when this first came in.
12 She brought them forth, and it is not anonymous. She brought
13 them in herself.

14 Q And she was right to do so?

15 A Absolutely.

16 Q Because AstraZeneca's U.S. compliance program states that
17 its employees must report actual or even suspected violations,
18 right?

19 A Right. And they should, as part of our speak-up culture,
20 absolutely.

21 Q Can we see Ms. McCullough again, Pat?

22 AstraZeneca's own rules state that no one at
23 AstraZeneca can retaliate against her because of her reports,
24 right?

25 A That is correct. It is in our code of ethics. We changed

B. McCullough - D

1 from code of conduct. It is code of ethics. It is also in our
2 U.S. policy handbook. It is in our managers' PIP. It is
3 pretty widely known and accepted.

4 Q Now, I want to fast-forward to February 5th. Suzanne went
5 to compliance, once again, on February 5th, 2019, right?

6 A I don't know the exact date. Yes. She did come to us. I
7 don't know what you are speaking about on the 5th of February.

8 Q Let's look at Plaintiff's Exhibit No. 81. What is this
9 document?

10 A So these are -- when a case comes in through the website,
11 it is captured into a report so we can keep track of what the
12 allegations are, who they were raised by, what the category is,
13 if it is around discrimination or whatever the topic might be.
14 We capture those and make sure we have a document.

15 Q Let's go down to the case assignee section, page 3. I
16 want to look at the case assignee's section -- all the way to
17 the right. This report came to you, right?

18 A Yes. They're in a database, yes.

19 Q Okay. And Suzanne disclosed that Stephani DiNunzio was
20 asking her to unethically expand AstraZeneca's patient base,
21 right?

22 A That was the allegation, I believe, yes.

23 Q To increase AstraZeneca's market share?

24 A Correct.

25 Q Suzanne disclosed that "the sales rep relationships were

B. McCullough - D

1 being asked to insinuate -- wink, wink -- that AstraZeneca's
2 respiratory products would help depressed and anxious patients
3 get their mental illness under control," right?

4 A I don't recall that exact point that you are making. If
5 it's in the report, I trust that it is, but I don't recall the
6 mental illness.

7 Q Okay. Let's go on up. Let's take a look at page 2. "We
8 are supposed to insinuate -- wink, wink -- that our respiratory
9 products -- BEVESPI, SYMBICORT, DALIRESP -- have a COPD anxiety
10 and depression indication and that feeling it working will
11 result in increased adherence."

12 Did I read that correctly?

13 A Yes.

14 Q Now, Suzanne followed AstraZeneca's compliance guidelines
15 by disclosing these concerns, right?

16 A Sure.

17 Q AstraZeneca's own rules prohibit any retaliation for
18 submitting these reports, right?

19 A Absolutely.

20 Q Now, you're AstraZeneca's vice president of compliance for
21 the BioPharma Business Unit. For the BioPharma Business Unit,
22 the compliance buck stops with you. You knew that AstraZeneca
23 was going to fire Suzanne on June 6th of 2019, right?

24 A That is not true.

25 Q Let's look at Plaintiff's Exhibit No. 67. Let's scroll

B. McCullough - D

1 down all the way to the bottom, please. Okay. Now, this is
2 the summary of employee relations case for awareness; employee
3 Suzanne. Do you see that?

4 A Yes, I can see it.

5 Q And let's scroll down.

6 All right. It says here, "Business unit will be
7 proceeding with terminating Suzanne Ivie from the organization
8 as of June 6th," right?

9 A Correct.

10 Q Right above that it says, "Suzanne is not accepting the
11 results of the investigations that have occurred and continues
12 to raise similar complaints," right?

13 A Yes.

14 Q Now let's scroll up.

15 You received this document from Amy Welch on
16 June 5th, right?

17 A Yes. I'm copied here. I think for me, when you are
18 asking the questions around the decisions as to whether or not
19 she would be terminated, I don't have -- that's not within my
20 gamut.

21 It's up to her sales management, and HR helps to make
22 those decisions. So when I was asked or questioned, that's
23 what I was referring to.

24 Q Well, you knew that AstraZeneca was going to fire Suzanne,
25 right, on the 6th, and you were sent this email on the 5th with

B. McCullough - D

1 the employee relations case. Right above it Mike Pomponi, to
2 underscore the point, says, "Dawn informed me that the
3 conversation with Suzanne Ivie is scheduled for this
4 afternoon."

5 Did I read that correctly?

6 A Yes.

7 Q You didn't intervene on June 6th to prevent human
8 resources from firing Suzanne Ivie, right?

9 A I didn't intervene because I was trusting that the
10 investigation was done in an appropriate manner from a
11 compliance perspective and an HR perspective.

12 Q You didn't intervene on June 6th to prevent human
13 resources from firing Suzanne?

14 MR. MCCARTHY: Objection, Your Honor. The question
15 was answered.

16 THE COURT: Please just answer yes or no.

17 THE WITNESS: Can you state the question again?

18 Sorry.

19 BY MR. OSWALD:

20 Q You didn't intervene on June 6th to prevent human
21 resources from firing Suzanne?

22 A I did not, because the reason for her termination was due
23 to performance.

24 Q Is that a yes?

25 A Yes, I did not intervene, because she was being terminated

B. McCullough - D

1 for performance reasons.

2 Q You only acted four days later, right?

3 A I wouldn't say "acted." I was reaching out for additional
4 information.

5 Q Well, what you were reaching out four days later was to
6 confirm that Suzanne had signed a mutual consent package,
7 right?

8 A I was curious that, yes, because I didn't know -- I didn't
9 know what the outcome was.

10 Q That Suzanne had signed a release of legal claims, right?

11 A I reached out to find out what the status was.

12 Q Of the mutual consent package and whether Suzanne had
13 signed it, right?

14 A Yes, that's what I was asked.

15 Q And the mutual release package includes a release of her
16 claims against AstraZeneca, right?

17 A Yes, it does.

18 Q In fact, it would release all legal claims Suzanne would
19 have had against AstraZeneca, correct?

20 A That's accurate.

21 Q All right. Now, Ms. McCullough, I want to ask you, in
22 your role as the vice president of compliance, part of your
23 job, is it not, is to communicate with the human resources
24 department on relevant matters?

25 A Yes, along with other departments.

B. McCullough - D

1 Q You did so routinely?

2 A Yes.

3 Q You did so routinely?

4 A Yes.

5 Q And you did so routinely on compliance or other related
6 matters, right?

7 A Yeah. As the need arises or if stuff came up, yes, we
8 would communicate within the U.S.

9 Q I want to show you for just a moment Plaintiff's Exhibit
10 No. 59.

11 Ms. McCullough, do you recognize this email?

12 A Oh, now I see it.

13 Q Do you recognize this email?

14 A I do.

15 Q It has you to Dawn Ceaser, right?

16 A Yes.

17 Q Did you send this to Dawn Ceaser at or about that time
18 that's indicated here? Did you prepare it at that time,
19 June 10th, 2019?

20 A I would have sent it exactly when it says it was sent. I
21 don't write messages and send them later.

22 Q You are getting my point. I appreciate that. Okay. And
23 this is the kind of communication that you would have as part
24 of your duties when you're working within the scope of your
25 duties at AstraZeneca, right?

B. McCullough - D

1 A Correct.

2 Q It was your practice generally to send these kinds of
3 emails to someone like Dawn Ceaser, right?

4 A Depending on the case. Each case is different. Yeah,
5 there is nothing out of the ordinary to have communications
6 between compliance and/or with legal. We work and collaborate
7 together at times, yes.

8 Q And AstraZeneca keeps these kinds of emails as part of its
9 compliance and other business-related functions -- keeps these
10 communications on its system for a period of time, right?

11 A Yes.

12 Q As they are produced through the system; through the
13 network?

14 A Correct.

15 MR. OSWALD: Your Honor, I move Plaintiff's Exhibit
16 No. 59 into evidence. It is relevant under Rule 402 for the
17 reasons I just elicited in her testimony. She has
18 authenticated the document under Rule 901. It is also an
19 803(6) business record with the discussion that we just had.

20 THE COURT: Thank you. Any objection?

21 MR. MCCARTHY: May we have a moment, Your Honor?

22 THE COURT: Certainly.

23 MR. MCCARTHY: No objection, Your Honor.

24 THE COURT: That exhibit will be received.

25

B. McCullough - D

1 BY MR. OSWALD:

2 Q I just want to take a look at this, if we could.

3 MR. OSWALD: Permission to publish, Your Honor?

4 BY MR. OSWALD:

5 Q Scroll down. Okay. Now, this is you to Dawn Ceaser,
6 right?

7 A Yes.

8 Q It says, "Did Suzanne accept?"

9 A Correct.

10 Q And what you are talking about there is the mutual consent
11 package?

12 A That's what I was referring to.

13 Q With the release of claims?

14 A Yes. I was just curious if that's where things had
15 bottomed out.

16 MR. OSWALD: Thank you, Ms. McCullough. No other
17 questions.

18 THE COURT: Thank you.

19 Cross.

20 MR. McCARTHY: Judge, may I have a moment to switch
21 the exhibit displays?

22 THE WITNESS: Thank you.

23

24

25

B. McCullough - X

1 CROSS-EXAMINATION

2 BY MR. MCCARTHY:

3 Q Good afternoon, Ms. McCullough. I am one of the lawyers
4 for AstraZeneca. Thanks for appearing.

5 A You're welcome.

6 Q I wanted to ask you a couple of questions about one of the
7 documents Mr. Oswald showed you, and that's Plaintiff's
8 Exhibit 67. So I'll try to put it up here. Let me know if you
9 can see it.

10 A I can see it. If you could zoom in a little bit.

11 Q Sure. At this point I just want to ask you if you recall
12 testifying about this document a few minutes ago. Now go maybe
13 to the fourth page would be the best place to look.

14 A Yes. I don't recall that first page.

15 Q Do you recall Mr. Oswald showed you this a few minutes
16 ago?

17 A I'm recalling other things. I'm not sure about this one
18 specifically.

19 Q Let's take a look at the third bullet. I think Mr. Oswald
20 read you a portion of the third bullet that says, "The business
21 will be proceeding with terminating Suzanne Ivie from the
22 organization as of June 6th, 2019."

23 Do you recall seeing that a few minutes ago?

24 A Yes.

25 Q What does the first bullet on this page say? I think

B. McCullough - X

1 that's the bullet that Mr. Oswald didn't read to you?

2 A "Suzanne is not willing to engage in the business as usual
3 work."

4 Q Why don't you read the first part of the third bullet that
5 Mr. Oswald only read part of it to you.

6 A "Due to the continued performance challenges and concerns
7 with Suzanne's delivering against the duties of the job, the
8 business will proceed with terminating Suzanne Ivie."

9 Q What we just looked at and that you just read, was that
10 consistent with your understanding of Suzanne Ivie's
11 termination from AstraZeneca?

12 A Absolutely.

13 Q Ms. McCullough, were you involved personally to
14 investigate any of Suzanne Ivie's complaints to compliance or
15 HR?

16 A No. We had investigators, Mike Pomponi and other
17 individuals within HR, that were investigating.

18 Q Were you involved personally investigating any of
19 Ms. Ivie's disciplinary issues that led to her termination?

20 A No.

21 Q Were you one of the decision-makers about whether Ms. Ivie
22 should be terminated?

23 A No. She is a sales employee, and so those decisions are
24 made through sales. I wasn't involved in that function. I
25 don't have the authority to make that decision to terminate

B. McCullough - X

1 someone.

2 Q You recall looking at an email between yourself and
3 Amy Welch in which you asked some questions of Amy Welch
4 regarding Suzanne Ivie?

5 A I did. I think Scott shared a little bit of that one.

6 Q Sure. I'm referring to the one we looked at earlier in
7 your testimony where you were asking some questions, not about
8 the mutual consent but some other issues around what was
9 described in the first email in that chain.

10 Do you recall that?

11 A Yeah. I don't know what section you are referring to, but
12 I think I recall the email chain, yes.

13 Q So when you first reached out with Amy Welch with these
14 questions, did you feel like you already knew all of the facts?

15 A I wasn't involved in investigating it, so I wasn't as
16 close. I would get periodic updates that Mike would give me,
17 but I wasn't close enough. So I reached out to Amy to get some
18 additional information or see where the status was.

19 Q And did Amy answer your question?

20 A She did.

21 Q And do you recall reviewing the response?

22 A Yes.

23 MR. MCCARTHY: Nothing further.

24 THE COURT: Thank you. Redirect.

25 MR. OSWALD: No, Your Honor.

1 THE COURT: May this witness be excused?

2 MR. OSWALD: The only issue is exhibits, Your Honor.
3 I think we resolved it this morning. If we are done -- if we
4 have resolved it, consistent during our discussion during the
5 work we did, then she is released. If not, I have got to go
6 through a lot of exhibits with her at this point. I need a cue
7 from the Court on that issue.

8 THE COURT: What other exhibits? I know 59 was at
9 issue.

10 MR. OSWALD: It is really everything in green,
11 Your Honor.

12 THE COURT: Those exhibits are received, as indicated
13 at the pretrial conference. I will allow defense counsel an
14 opportunity, on a break or a lunch, to make a record as to why
15 any of your objections would fall outside the contours of my
16 pretrial ruling.

17 Mr. Oswald, do you need this witness to make
18 foundation for any of the exhibits in green?

19 MR. OSWALD: Not if they are admitted into evidence,
20 Your Honor, which I think is your ruling, and I'm done. There
21 is a little bit of ambiguity on that point. If we can simply
22 agree that everything in green is in, then we are done.

23 MR. MCCARTHY: Your Honor, respectfully, I'm not sure
24 I understand the issue and prefer not to keep the jury here for
25 this. We are happy to confer. I think the witness should be

1 released, however.

2 THE COURT: Okay. I am going to release the witness,
3 and I feel confident that you folks can figure it out.

4 Ma'am, thank you very much for your time this
5 afternoon. I appreciate it. You are finished with us for the
6 afternoon.

7 Thank you.

8 THE WITNESS: Thank you.

9 THE COURT: Thank you.

10 Ms. Ivie, will you retake the stand, please.

11 MR. OSWALD: Your Honor, may we approach on this
12 subject quickly or take a five-minute scheduling break on this,
13 if we could?

14 THE COURT: Can we do it at the afternoon recess?

15 MR. OSWALD: I think there is something that we need
16 to resolve in scheduling so we can keep things moving.

17 THE COURT: Oh, scheduling?

18 MR. OSWALD: Yes.

19 THE COURT: I hate to do this. Yes. Will you take
20 the jury out.

21 (Open court; jury not present:)

22 MR. OSWALD: So we took Ms. McCullough obviously a
23 little bit out of turn. I completely understand and agreed to
24 that, because I understand she is a very busy person. It's not
25 an issue.

1 MS. RIECHERT: She has been on call since Tuesday
2 waiting to testify.

3 MR. OSWALD: I'm ready to respond and continue.

4 So now we have two issues: One is we have some
5 witnesses -- some very short witnesses -- that we want to get
6 in this afternoon. They are very short. There are the three
7 witnesses. I'm thinking one will be ten minutes and the others
8 will be 15 minutes. I can't imagine there is a whole lot of
9 cross. We would like to get those on this afternoon.

10 We have a doctor, which we agreed we could call at
11 three o'clock. She will be on the screen. So since we have
12 already broken Ms. Ivie's testimony for the purposes of
13 Ms. McCullough, I would like to call those three very quickly.
14 Then we can bring Ms. Ivie back to the stand, have the doctor
15 on at 3:00, and then we have Scott Severt that we would like to
16 get in this afternoon. He is the expert. He has got a flight.
17 And again, if we do that, then I think we are going to move
18 very swiftly to get a number of witnesses done this afternoon.

19 So that's what I'm proposing.

20 MS. RIECHERT: I have a problem with that. Again, I
21 would like to complete the cross-examination of Ms. Ivie. We
22 interrupted it for this witness -- for this witness who was
23 supposed to be called on Tuesday morning. Then she was moved
24 to Wednesday and Thursday. We agreed on a time certain for
25 her. I think we need to get Ms. Ivie finished.

S. Ivie - X

1 I heard during the break now that they want to bring
2 in witnesses on Monday. It's the thing I have been worried
3 about. They were 22 minutes over on Ms. McCullough. They said
4 20 minutes. She was 42 minutes. Now they want to bring in
5 more witnesses on Monday. We have cut our time down to -- I
6 forgot what it was -- eleven hours or ten hours. Theirs is
7 still at 13 hours. It is very frustrating for me. We need to
8 get this trial over. Ms. Ivie should finish next. We agreed
9 to the doctor at 3:00. If we get to the other people, that's
10 fine. I don't want to have witnesses on Monday. We have got
11 closings and jury instructions and deliberations.

12 THE COURT: I'm going to go ahead and have Ms. Ivie
13 on the stand.

14 Please be seated.

15 (The court reporter requested a recess.)

16 (Recess.)

17 (Open court; jury present:)

18 THE COURT: Thank you, jurors.

19 Ms. Ivie, be seated. Remember, you are under oath.

20 Please continue.

21 CROSS-EXAMINATION

22 BY MS. RIECHERT:

23 Q If you could take a look at Exhibit 177. This was the
24 email that we looked up in your direct examination. So this
25 was the email that you looked at earlier in your examination

S. Ivie - X

1 from Ms. Chambers. It says, "Suzanne and I have discussed this
2 a number of times. I know her numbers look off. It is because
3 of taking on Tri-Cities and Spokane."

4 What was Tri-Cities?

5 A Tri-Cities is three cities within the territory.

6 Q In which state?

7 A Spokane, Washington.

8 Q So this was the cities that you had taken on for a brief
9 period of time in 2018, correct?

10 A Yes.

11 Q And you added five additional sales professionals?

12 A Yes.

13 Q It was those cities and Spokane and the Tri-Cities that
14 you were allowed to blend your live field rides and virtual
15 coaching, meaning for those cities you could do virtual
16 coaching, right?

17 A Yes, we did talk about that.

18 Q And you could do that without customer engagement?

19 A Yes.

20 Q But you never got an email from Ms. DiNunzio saying you
21 could coach without customer engagement in Idaho?

22 A An email? No.

23 Q You never got an email from Ms. DiNunzio saying you could
24 coach without customer engagement in Salt Lake City more than
25 20 percent of the time, did you?

S. Ivie - X

1 A No, not an email.

2 Q Let's look at Exhibit 507.

3 Looking at Exhibit 507, this was the email that you
4 talked about in your direct examination where Ms. Ivie (sic.)
5 notifies you that you are only coaching between, I think, 43 --
6 47 and 53 percent of your time with customer engagement in the
7 first three-quarters of the year.

8 Do you recall that?

9 A Yes.

10 Q And you received that email on December 18th, 2018,
11 correct?

12 A Yes.

13 Q You read it when you received it, yes?

14 A Yes.

15 Q And this was before you had the meeting with Ms. DiNunzio
16 when you went over your review, correct?

17 A Did I see it on December 18th? Yes.

18 Q I actually think that meeting was on the 19th. If you can
19 recall, you were giving a piano concert on the 18th, and you
20 had taken a personal day that day, and so your meeting with
21 Ms. DiNunzio on the 18th was rescheduled to the 19th.

22 Do you recall that?

23 A Not necessarily. But I do piano things, and so it
24 wouldn't be odd.

25 Q So you started reporting to Ms. DiNunzio about September

S. Ivie - X

1 of 2017, correct?

2 A Excuse me. Yes.

3 Q And when you started reporting to her, you were "the
4 golden child"; is that correct?

5 A Yes.

6 Q She was absolutely thrilled with everything you did,
7 correct?

8 A Yes.

9 Q And then that started to change in mid-2018, correct?

10 A Yes. August.

11 Q Now, would you agree that the two primary responsibilities
12 of a district sales manager were, first, performance; and
13 second, development of the team that reported to you?

14 A Yes.

15 Q Your responsibility was to get the team motivated,
16 developed, and being on leadership teams, correct?

17 A Yes.

18 Q But of those two, performance was the most important,
19 correct?

20 A Performance was important, yes.

21 Q The most important?

22 A Yes.

23 Q And your performance numbers were not good in 2018, were
24 they?

25 A They were lower than the 100 percent in three of the

S. Ivie - X

1 trimesters.

2 Q In fact, your team rated 106th out of 128 through the
3 whole country through the third quarter of 2018?

4 A Through the third quarter, yes.

5 Q And that was the bottom 17 percent of the country?

6 A Yes.

7 Q By the end of the year, it was even lower, correct? You
8 were in the bottom 13 percent in the country?

9 A Yes.

10 Q And you would agree that's well below average, wouldn't
11 you?

12 A Yes.

13 Q And well below what it had been the year before?

14 A Yes.

15 Q Now, AstraZeneca says that one of the ways to improve the
16 performance of a team is for the district managers like you to
17 go on a lot of sales calls with the sales professionals who
18 report to you; isn't that correct?

19 A Yes.

20 Q And that's what they call field coaching, right?

21 A Yes.

22 Q And that's when you are watching the sales representative
23 talk to the physician, correct?

24 A Yes.

25 Q And you would be in the car with the sales representative

S. Ivie - X

1 before the call going over what the sales representative was
2 going to say during the call, correct?

3 A Yes.

4 Q And the reason that the company wants you to spend
5 80 percent of your time in field coaching and observing your
6 team is so that you can coach them on how to improve their
7 selling skills; isn't that true?

8 A Yes.

9 Q Now, when you fill out your time records in Veeva, you are
10 supposed to record the time that you are in the field coaching
11 with customer engagement; and then separately, the time when
12 you are not in the field and not coaching with customer
13 engagement; is that correct?

14 A Yes.

15 Q And you knew that coaching with customer engagement meant
16 that you needed to be in the field with your team, correct?

17 A Yes.

18 Q And you admit that you put down in your time records days
19 for coaching with customer engagement when, in fact, you were
20 not in the field with your team, correct?

21 A Yes.

22 Q You also admit that you filled out field coaching reports
23 even though you were not in the field with the sales
24 representatives that you supervised, correct?

25 A Yes.

S. Ivie - X

1 Q And other than Spokane -- I already covered that.

2 Ms. DiNunzio never told you you didn't have to spend
3 80 percent of your coaching time with the Boise reps in the
4 field, did she?

5 A Not specifically that, no.

6 Q You just assumed that?

7 A We did have a conversation.

8 Q You just assumed that you wouldn't have to spend
9 80 percent of your time with the Boise reps, correct?

10 A Yes.

11 Q Ms. DiNunzio never told you that it was appropriate for
12 you not to comply with the 80/20 rule with respect to the sales
13 reps near your home in Salt Lake City, did she?

14 A We had a conversation over all of it.

15 Q The question is: She never told you that it was
16 appropriate for you not to comply with the 80/20 rule with
17 respect to the sales reps near your home in Salt Lake City,
18 correct?

19 A Yes.

20 Q Yes, she never told you?

21 A We had a discussion.

22 Q She never told you that you didn't have to comply with the
23 80/20 rule for the sales reps in Salt Lake City, correct?

24 A We had a discussion.

25 Q Would you like me to refer to your deposition?

S. Ivie - X

1 A I said, yes, we had a discussion. We had a discussion,
2 yes.

3 Q Right. But she never told you that you didn't have to
4 comply with the 80/20 rule for the sales reps in
5 Salt Lake City?

6 A Yes.

7 Q Yes, she never told you that?

8 A Yes.

9 Q Your team in Idaho was performing poorly in 2018, wasn't
10 it?

11 A They had some struggles.

12 Q Didn't you give them a two or their performance reviews?

13 A Yes.

14 Q Yet you still weren't spending 80 percent of your coaching
15 days in Idaho to help them improve as they spoke with the
16 healthcare professionals?

17 A I was not.

18 Q Now we are going to talk about engaging with insights.
19 Insights is a statement that the sales representative makes at
20 the beginning of the sales call to engage the doctor; is that
21 correct?

22 A Yes.

23 Q It is what you used to call "fun facts"?

24 A Yes.

25 Q What were fun facts?

S. Ivie - X

1 A They were just that -- fun facts. Fun facts of the
2 weather quality outside. You could go to the newspaper. They
3 talk about the weather quality -- poor weather quality; good
4 weather quality. We'd bring that up with the physician. We
5 were talking about asthma, so other weather qualities affect
6 the lungs.

7 Q And you came up with these fun facts before AstraZeneca
8 rolled out their insights program, right?

9 A Well, my team did.

10 Q And you too or just your team?

11 A Well, I'm head of my team. I'm the district manager of my
12 team.

13 Q And there is nothing improper about fun facts, right?

14 A I don't believe talking about the weather or the air
15 quality is.

16 Q And there is nothing improper about the insights that
17 AstraZeneca used, so long as they were compliant, right?

18 A Yes.

19 Q And you received training on insights in March of 2018;
20 isn't that correct?

21 A I don't necessarily remember that. But yes, we did
22 receive the --

23 Q I'm going to show you some of the training materials.

24 Let's start with Exhibit 508. This is called "Engage With

25 Insights Worksheet." Was that part of the training materials

S. Ivie - X

1 that you received in March of 2018.

2 A I'm not sure I remembered this before my deposition --
3 reading this particular article.

4 Q Do you recall receiving training that you were supposed --
5 the insights were okay, but they have to be consistent with the
6 product label, correct?

7 A Yes.

8 Q Aligned to brand strategy, correct?

9 A Uh-huh.

10 Q And be true and not misleading, correct?

11 A Yes.

12 Q Let's look at Exhibit 531. Looking at Exhibit 531, is
13 this an email that Stephani DiNunzio, also known as
14 Stephani Orgren, sent to you and other members of the team
15 about insights?

16 A Yes.

17 Q And she attached to this email a deck, also known in this
18 case, a long PowerPoint -- about engaging with insights,
19 correct?

20 A Yes.

21 Q So looking at the email, it states, "PSSs are excited
22 about having the ability to engage in insights. That's a great
23 thing." Correct?

24 A Are you asking me if it is on this paper?

25 Q Yes. It is on the email, it is the first and second

S. Ivie - X

1 bullet points.

2 A Yes.

3 Q Ms. DiNunzio also tells you and the other team members,
4 "We need to ensure that they are using this new skill
5 appropriately for the following reasons: One, to remain
6 compliant; two, to avoid distraction from our brand strategy;
7 and three, to have its intended impact, which is to get the
8 healthcare professional to stop and think," correct?

9 A Yes.

10 Q Now we can go to the presentation, Exhibit 531. Let's
11 look at page 6. By the way, the first page, that was the
12 presentation you got with the training that you got in March of
13 2018 about engaging with insights, correct? So March of 2018
14 you get a training on engaging with insights, correct?

15 A Yes.

16 Q And you get a long presentation about that training,
17 correct?

18 A Yes.

19 Q Let's look at page 6. This is telling us what an insight
20 is. If you look, it says, "What is an insight? A fresh and
21 penetrating truth about the market or customer that can be
22 applied to create an advantage for our brands. A problem or
23 challenge that the customer either under-appreciates or is
24 unaware of."

25 Do you agree that's a correct description of an

S. Ivie - X

1 insight?

2 A Yes.

3 Q Let's look at page 31. It is called "Guiding Principles
4 of Insights." That's part of the same training presentation
5 that you received in March of 2018, correct?

6 A I don't remember any of this, but, yes, it's here.

7 Q Okay. "Insights should come from approved brand
8 resources" -- remember, we talked earlier about two types of
9 insights, brand and local. So they either can be brand
10 insights, where they come from approved brand resources,
11 correct, or they can be local insights, correct?

12 A Yes.

13 Q And if they were local insights, they had to be consistent
14 with the product label, aligned to brand strategy, and be true
15 and not misleading, correct?

16 A That's what it says.

17 Q And then local insights must adhere to the policies on
18 promotional activities, correct?

19 A That's what it says here.

20 Q Next is page 36, "Areas to avoid. Why would these be
21 inappropriate if linked to the brand." Then this tells you the
22 things that you can't put in in an insight -- financial data,
23 quality metrics, et cetera, et cetera. Do you recall that
24 being part of the training, or do you just don't recall the
25 training?

S. Ivie - X

1 A I don't really recall the training, but it says it is
2 here. It has been a little while.

3 Q You never saw a sales representative use an off-brand
4 insight, did you?

5 A I don't believe so. If I did, it would have been trying
6 to re-correct or look into it. But I mean, it has been a
7 while. I don't -- I'm trying to think. I don't -- I don't
8 know.

9 Q Do you recall that you gave a deposition in this case?

10 A Oh, yeah. I remember that.

11 Q A deposition is when you are given testimony under oath,
12 correct?

13 A Yes.

14 Q And you were asked questions by Mr. McCarthy, correct?

15 A Yes.

16 Q And you answered those under oath, correct?

17 A Correct.

18 Q And that was closer in time than where we are today,
19 right?

20 A Much closer.

21 Q So your recollection was better then than today?

22 A Perhaps.

23 Q If you want to look at your deposition at page 161, lines
24 21 to 25:

25 "QUESTION: Did you ever see a sales rep use an

S. Ivie - X

1 off-label insight with a healthcare professional?"

2 A What am I looking for?

3 Q 161, page 21 to 25 -- lines 21 to 25.

4 A Where are we?

5 Q 161, lines 21 to 25:

6 "QUESTION: Did you ever see a sales rep use an
7 off-label insight with a healthcare provider?

8 "ANSWER: I don't believe completely off-label."

9 A I think that's what I said.

10 Q So as far as you know, none of the sales reps that worked
11 for you ever gave any insights that were improper, correct?

12 A I don't believe so. We kind of started them out. I don't
13 believe so.

14 Q And you don't know of any sales reps who worked for you
15 who ever gave any insights that were misleading, correct?

16 A I would hope not or I would at least -- I think they tried
17 different things, but I would hope that it wouldn't. I mean,
18 they did try different things.

19 Q As far as you know, there were no sales reps that gave
20 insights that were providing inaccurate information, correct?

21 A I would hope not.

22 Q In fact, you know of no sales representatives in
23 Ms. DiNunzio's group who ever gave any insights that were
24 improper or misleading or provided inaccurate information,
25 correct?

S. Ivie - X

1 A I didn't -- I was the district sales managers for all of
2 DiNunzio's sales reps, so I wouldn't know.

3 Q You wouldn't know or you don't know?

4 A I don't know.

5 Q Now, in your hotline call in December of 2018, you
6 complained about the insights and discussion that you testified
7 to earlier that occurred in late August and early
8 September 2018, correct?

9 A Yes.

10 Q So that was about three to four months before your hotline
11 call, correct?

12 A In August, you are talking?

13 Q Late August, early September.

14 A Yes.

15 Q Even though you were the compliance officer at the time of
16 these August/September emails, you did not report it at the
17 time, correct?

18 A I'm sorry? What?

19 Q At the time of these emails that you were talking about in
20 your direct examination, the ones with Teresa Grey, in August
21 and September --

22 A Yes.

23 Q They were August and September 2018. You did not report
24 those at the time, correct?

25 A Not in the anonymous one. Teresa Grey is the compliance,

S. Ivie - X

1 so I did report it to her. I sent the email.

2 Q Right. We will go through that in a little bit.

3 But you didn't make a hotline complaint in August or
4 September of 2018. You waited until December of 2018 to
5 complain about this email chain in August and September 2018,
6 correct?

7 A I sent it to Teresa Grey, who is compliance, and so she
8 looked at it. I didn't see that I needed to add it to
9 December, because I had already talked to the compliance
10 person, and she was aware of it.

11 Q But you did add to the December hotline complaint?

12 A I added to it?

13 Q Yes.

14 A Yes. It was kind of like the whole overview of everything
15 that has been going on. I mean, there is a pattern here. So
16 that's why, yes.

17 Q But you were the compliance officer in August through
18 September 2018, right?

19 A I was.

20 Q So if you thought there was anything improper about what
21 was going on, you would be required to make a hotline complaint
22 about it?

23 A I went to the compliance department but not anonymously.
24 I literally went there. Well, email, not like in person. I
25 emailed it.

S. Ivie - X

1 Q Let's go to that email, Exhibit 123. I think we are going
2 to start towards the bottom and work our way up, as emails do.
3 So we can go up above that. You'll see this email from
4 Ms. DiNunzio to you.

5 "As we discussed in our recent leadership call, I
6 asked Ketari to share a few new insights with the DSMS team
7 every few weeks. It's at the discretion of the DSM to share
8 them with their respective teams. Please take a look at the
9 email below and let me know if it raises any compliance
10 concerns. If not, Ketari will forward it on to the DSMS. If
11 yes, please provide suggestions somehow to keep it compliant.
12 My comments are in blue. I believe we are in good shape if the
13 source of the data is provided."

14 That's the email that Ms. DiNunzio sent to you,
15 right?

16 A Correct.

17 Q She is not asking you to approve the insights, correct?

18 A "Please provide suggestions. Let me know if it raises any
19 compliance concerns." That's my interpretation.

20 Q Then as the compliance officer, you forwarded that email
21 from Ms. DiNunzio to Teresa Grey in the compliance department,
22 correct?

23 A Yes.

24 Q And then Teresa Grey responds, "Hi, Suzanne and Stephani.
25 Thanks for reaching out with this issue. Per our discussion

S. Ivie - X

1 this afternoon, I understand Stephani would like to use the
2 messaging and related resources you provided below with her
3 regional team in a biweekly email. You also explained that the
4 emails are for internal distribution by RTSS to DSMs and
5 PSSs" -- that's the regional training specialist to the
6 district sales manager and the pharmaceutical sales specialist,
7 right?

8 "However, the messaging within the email is intended
9 to be used by PSSs with the appropriate HCP verbally and not in
10 written form (electronic or paper) on sales calls," right?
11 That's what Ms. Grey tells you?

12 A Yes.

13 Q Then she goes on to say, "Using insights for messaging
14 with our HCPs is a decision made by the business applying our
15 principles, policies, and best practices. Compliance does not
16 approve this type of messaging but supports our business
17 partners by providing appropriate resources and guidance."

18 So she is not telling you that there is anything
19 wrong with these insights, right? She is just telling you that
20 compliance doesn't get involved in approving them, correct?

21 A Compliance -- will you repeat that question?

22 Q So Ms. Grey is saying compliance doesn't get involved in
23 approving these local insights; it is up to the business to
24 decide whether the insights should be used --

25 A Business can do their own thing, but compliance is to make

S. Ivie - X

1 sure you're compliant with what practices you do. Compliance
2 doesn't create that for you.

3 Q Right. Compliance doesn't approve all of these local
4 insights. That's up to the business to make sure they're
5 compliant.

6 A Yes. Then compliance makes sure it is compliant.

7 Q But she is not telling that you can't send these insights
8 out by email, right?

9 A I don't think she was strongly encouraging it.

10 Q But she doesn't say you can't send out the insights,
11 correct?

12 A I think I did have a conversation, and she said it wasn't
13 very good.

14 Q She is not saying, "Hey, don't send these out," right?

15 A No.

16 Q I thought you had said earlier that you said she said you
17 couldn't send them out. That's why I was clarifying that.

18 Then it goes on to say, "Per my earlier email, for
19 appropriate and consistent use of insights with the HCPs, I
20 recommend Stephani contact" -- and then she gives some names of
21 people in the training department, correct?

22 A Yes.

23 Q And then you respond, "Thanks, Teresa, for the guidance.
24 Always a pleasure to talk to you. I have reached out to Brook
25 and Kevin to access the Engaging With Insights virtual

S. Ivie - X

1 training."

2 I think I got to the end of this now. You thought
3 training was needed because you had forgotten that everybody
4 had been trained in March; is that right?

5 A No. We still had questions. And for her wanting to know
6 what to do, I thought it would be a good idea that we all know
7 what to do, and I believed the compliance was fairly press --
8 this update was fairly recent.

9 Q So Ms. DiNunzio responds, "Let's pause on this, Suzanne.
10 There is no get the training department involved." And that's
11 because you had just been trained a few months earlier, and so
12 she didn't think you needed to go through that whole 70-page
13 training deck --

14 A Wasn't that training in March of 2018?

15 Q This is September 2018.

16 A Oh, okay. I thought you were talking about January.
17 There was January up there. Yes. But there had been -- my
18 understanding was there was some new training.

19 Q You said that after this took place in September of 2018,
20 Ms. DiNunzio said that she would take over the regional
21 training role, correct?

22 A Yes.

23 Q And that was at the same time that you were not meeting
24 your performance expectations, correct?

25 A She gave me the compliance -- excuse me -- not the

S. Ivie - X

1 compliance. You're talking about regional training, right?

2 She gave the regional training probably in the July time frame,
3 so I would have been in the midst of that.

4 Q I thought you said she took it away from you --

5 A Oh, yeah, in September. She gave it to me in July-ish
6 maybe and then took it away in September.

7 Q And that was at the time that you weren't meeting your
8 performance expectations?

9 A Yes. July, August, and September, yes.

10 Q Let's go to the December 10th to 12th meeting in Idaho
11 that you talked about in your examination of Ms. Chambers.
12 That was the meeting when Ms. DiNunzio said that it was rough
13 year, right?

14 A Yes. For the whole region, yes.

15 Q And performance needed to improve?

16 A Yes.

17 Q Now, you missed the DALIRESP portion of that, right?

18 A I did.

19 Q Because you were involved in this leadership program that
20 you were working on, right?

21 A Yes. We had a teleconference.

22 Q Right. So you were too -- you were busy with the
23 leadership to attend the regional meeting where they discussed
24 DALIRESP, correct?

25 A Yes.

S. Ivie - X

1 Q It was after that December 10th meeting in Idaho that you
2 became concerned that Ms. DiNunzio was saying things that were
3 inaccurate, right?

4 A Yes.

5 Q And you talked about 50 percent of patients die after the
6 first exacerbation?

7 A Yes.

8 Q Now, Ms. DiNunzio said in court -- came to court and
9 testified that what she said was 50 percent of patients die
10 within 3.6 years after the first exacerbation, and she said
11 that she had heard that on a regional managers leadership call
12 she attended. Do you recall her testimony in that regard?

13 A Yes.

14 Q And I assume you didn't hear the 3.6 years part of it?

15 A No.

16 Q Now, I think you said -- you suggested that "Ms. DiNunzio
17 suggested -- wink, wink -- that it could be used for primary
18 prevention," right?

19 A Yes. We needed to expand our patient population.

20 Q And you testified you were very concerned about that,
21 right?

22 A Yes.

23 Q And you talked to Linda Truax about it?

24 A Yes.

25 Q And you wrote to Mandy Hosford about it?

S. Ivie - X

1 A Yeah.

2 Q Now, when you met with Ms. DiNunzio on December -- I think
3 it is the 19th of 2018 to talk about your performance review --
4 she showed you a copy of a document during the meeting,
5 correct.

6 A On DALIRESP?

7 Q No. This is your performance review.

8 A Oh, yeah.

9 Q So is it a document that looked a little bit like this,
10 but it didn't have a rating on the top?

11 A Something similar.

12 Q And then she went over that document with you during this
13 meeting on December 18th or 19th, 2018, correct?

14 A I believe so.

15 Q And she told you that your rating was going to be a one or
16 two?

17 A She said two. Then under her breath, "Maybe. You're
18 lucky to get a one."

19 Q At this meeting she went over her concerns about your
20 coaching days, right?

21 A Yes.

22 Q And she talked about coaching with customer engagement and
23 coaching without customer engagement, right?

24 A Yes.

25 Q And she told you that 80 percent was supposed to be good

S. Ivie - X

1 customer engagement, right?

2 A We talked about that, yes.

3 Q Now, you testified earlier today that at the same meeting
4 that she went over your performance, that was the time she
5 talked again about DALIRESP that concerned you, right?

6 A I brought that up.

7 Q And it was right after that meeting, when she talked about
8 DALIRESP in a way that you thought was concerning, that you
9 decided to contact the hotline, correct?

10 A You're talking about the December 18th meeting?

11 Q Yes. Or 19th is what I think it is.

12 A We talked about that there, and that's when I told her
13 that there are concerns.

14 Q Right. And it was right after that meeting that you
15 decided to contact the hotline, correct?

16 A Yes.

17 Q And so you made that hotline complaint the same day as you
18 had this review meeting with Ms. DiNunzio, right?

19 A Yes. May I add context?

20 Q Then let's look at Exhibit 75. Exhibit 75 is going to be
21 the hotline complaint that you made.

22 A Okay.

23 Q Let's go to the pages where there is a discussion about
24 all the issues that Ms. Ivie raises. So this here is where you
25 raise all of the issues that you have. It goes onto

S. Ivie - X

1 the next page as well. It goes all the way through down to the
2 bottom of that page. Nowhere in that hotline complaint did you
3 say anything about this DALIRESP concern that had been raised
4 that very same day, according to you, by Ms. Ivie (sic.); isn't
5 that correct?

6 A Yes.

7 Q Even though it was so concerning to you, you don't mention
8 it in the hotline complaint that you made?

9 A Yes. I mention it later in January.

10 Q So even though you said that Ms. DiNunzio said things at
11 the meeting about DALIRESP, when you filed the ethics
12 complaint, the same day, right after the meeting, you never
13 said anything about what you now say Ms. DiNunzio said at the
14 meeting about DALIRESP, correct?

15 A I did not write it in there. There was a lot of stuff.

16 Q Now, you talked about after you had filed this hotline
17 complaint you were feeling upset, because I think --

18 A Yes.

19 Q -- you had a bad review meeting, and you were going to get
20 a one or two, and you were very upset?

21 A There was a lot to be upset about.

22 Q Right. Then you said you went home, and you couldn't
23 decorate your Christmas tree?

24 A I have two younger children.

25 Q How old were they at the time? This is December 2018.

S. Ivie - X

1 A 13, 14, and 10 or 11-ish.

2 Q Okay. And you said you only put lights on the tree that
3 year, right?

4 A And some pinecones.

5 Q Are your kids not old enough to decorate the tree?

6 A Yes, they are. However, it is a family event, and
7 decorating is something that I do as a mother.

8 Q And then right after that, you went on a vacation in the
9 Dominican Republic, right?

10 A Yes.

11 Q Now, let's turn to 2019. The first time that -- let's
12 look at Exhibit 29. If we can go to the second page. So
13 January 15th -- this is the first time that you reach out to
14 Teresa Grey to ask about these two statements that you say that
15 Ms. DiNunzio had made back in December?

16 A I'm sorry? Would you repeat the question one more time?

17 Q Yes. So on January 15th -- if we want to go back and
18 check that date, this is the email that you sent to Teresa Grey
19 on January 15th.

20 Do you see that on the bottom of the page?

21 A Yes.

22 Q Then the next page you reach out to her, and you ask her
23 about these two statements that you say Ms. DiNunzio had made
24 back in December of 2018, correct?

25 A Yes.

S. Ivie - X

1 Q So it took you almost a month after you say the statements
2 were made for you to reach out to Ms. Grey, correct?

3 A Yes.

4 Q Even though she was your compliance person, correct?

5 A Yes.

6 Q Let's switch now to February of 2019. You met with
7 Ms. DiNunzio and with Karen Belknap to discuss Ms. DiNunzio's
8 concerns about your field coaching; is that correct?

9 A Yes.

10 Q Let's look at Exhibit 91. If can get to the page, which
11 is the summary that Ms. Belknap prepared with the meeting with
12 you.

13 So if you look at the bottom of this page, it says,
14 "2-18-19," and we have all learned now that an "OTR" is an
15 opportunity to respond.

16 In this document Ms. Belknap writes, when asked by
17 Ms. DiNunzio what was the expected number of field coaching
18 days per year for a DSM, you responded that you thought it was
19 140. In fact, it was 150, correct?

20 A Yes.

21 Q It goes on to say, "Ms. DiNunzio responded that it was
22 adjusted to 150 in 2017."

23 "Regarding the split of coaching with selling
24 interactions versus non-selling interaction, Ms. Ivie stated
25 she had no idea, until a few weeks ago, when Ms. DiNunzio

S. Ivie - X

1 mentioned that her split was 80/20."

2 But we went through a whole bunch of emails that you
3 received way back in 2018 and mid-2018 where she had told you
4 the exact same thing, right?

5 A Yes. But there was more of a conversation.

6 Q "Ms. DiNunzio stated that the split went into effect in
7 June of 2017. Ms. Ivie admitted she does a lot of coaching
8 without customer engagement calls. She described this as
9 having a call at the beginning of the day with the PSS to
10 review their pre-planning and then checking in with them at the
11 end of the day to see how their day with customers went. She
12 stated that she did the calls versus going to spend the day
13 with the PSS because of budget concerns. Ms. DiNunzio stated
14 to Ms. Ivie that she had never placed budget restraints or
15 field rides."

16 Then you talked about the months of July and August
17 of 2018. In July, Ms. DiNunzio notes that there were 21
18 available days for field rides, and you had only completed 5.5
19 days. In August, there were 23 days available, and you had
20 only completed two days of field coaching.

21 "So when asked how you account for your time" --
22 let's go to the next page -- "when she was not in the field,
23 she stated that she conducted pharmacy calls."

24 Now, pharmacy calls are something that the sales
25 representatives are supposed to do, right?

S. Ivie - X

1 A Yes.

2 Q It is not something that the DSM is supposed to do, right?

3 A No -- well, we can.

4 Q But your job is to spend your time with the DSMs in the
5 field and coach them and develop them.

6 It goes on to say "she was on a headcount," and
7 that's why you did the pharmacy calls. She went on to say that
8 "she was holding business reviews and developmental discussions
9 via a conference call with the reps in place of conducting
10 field rides. Ivie stated that she feels her time is stretched
11 thin because she is on a number of national committees and
12 panels."

13 So let's talk about the statement that you were not
14 going to do your field rides because of budget concerns.
15 No one had ever instructed you that you shouldn't travel for a
16 field ride because of a budget, did they?

17 A They were to stay within the budget.

18 Q So just hear the question: No one ever instructed you
19 that you should not travel for a field ride because of a
20 budget, correct?

21 A We were given a budget for travel, if that makes sense.

22 Q Yeah. But it didn't really answer the question.

23 A Okay. Repeat that.

24 Q Nobody ever told you that you shouldn't travel for a field
25 ride because of a budget, correct?

S. Ivie - X

1 A Yes.

2 Q There were no emails telling you to cut back on field
3 rides because of budget concerns, were there?

4 A Just budget emails, but no.

5 Q But no emails telling you to cut back on field rides
6 because of budget concerns, correct?

7 A No.

8 Q At no point in time did Ms. DiNunzio ever tell you not to
9 make field rides because of budget concerns, correct?

10 A No.

11 Q At no time -- sorry. She never did tell you -- there are
12 so many negatives here.

13 At no point did she tell you not to make field rides
14 because of budget concerns? She didn't say to you, "Hey,
15 Suzanne, don't make any field rides because we have budget
16 concerns"? She never said that, correct?

17 Sorry about my negatives.

18 A (Inaudible.)

19 THE COURT REPORTER: What was your answer to the last
20 question?

21 THE WITNESS: Yes -- I have no idea.

22 BY MS. RIECHERT:

23 Q Let me go back. At no time did Ms. DiNunzio say to you,
24 "Hey, Suzanne" -- or words to this effect -- "I don't want you
25 to do field rides because of budget concerns." She didn't ever

S. Ivie - X

1 say that to you, did she?

2 A No.

3 Q Never said that.

4 At no time did you ever ask Ms. DiNunzio, "Hey,
5 should I cut back on my field rides because of budget
6 concerns?"

7 You didn't say that to her?

8 A No.

9 Q You didn't say that to her. Now, you understand that if
10 you booked flights a little further away from when you are
11 going to fly, that makes it cheaper, right?

12 A Yes.

13 Q And you understand that want to spend as little on flights
14 as possible, correct?

15 A Yes.

16 Q And you want to book early if you are going to do that,
17 right?

18 A That's the idea.

19 Q And some hotels are more expensive than other hotels,
20 right?

21 A Yes.

22 Q So the emails asking you to watch budgets, they were
23 asking you to just be sensitive when booking travel and hotels
24 so you don't waste the company's money, right?

25 A Yes.

S. Ivie - X

1 Q Never told you shouldn't do an essential requirement of
2 your job, which was to spend 80 percent of your time on field
3 rides with your reps?

4 A Right.

5 Q Going back to Exhibit 91 -- I may have gone through all of
6 this. Sorry.

7 It was after that meeting that you were told that you
8 were going to be put on a written warning, correct?

9 A What meeting?

10 Q After that meeting on the 18th of February, 2019?

11 A Can you repeat the question?

12 Q So you had this meeting on February 18th, 2019, with
13 Ms. Belknap and Ms. DiNunzio, and then you were told that you
14 were going to be put on a written warning?

15 A Right.

16 Q That's when you decided that you would start looking for
17 another job outside of AstraZeneca, right?

18 A It was a -- a written warning kind of reduces your ability
19 to move up in the company, and it is not a good thing.

20 Q So that's when you started thinking about looking for a
21 job outside of AstraZeneca, right?

22 A Did I start thinking about it?

23 Q Yeah.

24 A I knew that AstraZeneca probably was telling me a good
25 warning, but I did not sort of actively look for a job.

S. Ivie - X

1 Q Well, you were looking for a recruiter to help you
2 potentially leave the company, right?

3 A I believe I asked somebody, yes.

4 Q Now, let's look to March of 2019. You got the written
5 warning, right?

6 A March 18th?

7 Q No, March of 2019.

8 A Yes.

9 Q And it told you that 80 percent of your time had to be
10 spent with customer engagement, right?

11 A Yes.

12 Q And that meant you had to be in the field with the sales
13 reps making calls on healthcare professionals?

14 A Yes.

15 Q And again, you didn't do it, right?

16 A In March to April, I was on medical leave.

17 Q Right. But while you were on your leave, the company
18 increased the number of coaching days from 150 to 160, right?

19 A That's what I was told.

20 Q That applied to you and all the other DSMs in respiratory,
21 didn't it?

22 A I believe so.

23 Q It didn't apply just to you, right?

24 A I was told it was everybody.

25 Q And it didn't increase because you had complained about

S. Ivie - X

1 Ms. DiNunzio, correct?

2 A I doubt that's what it was. I don't know.

3 Q It didn't increase because of your age, right?

4 A No.

5 Q It didn't increase because you took a leave of absence,
6 right?

7 A I don't believe so.

8 Q Now, one of the things that you think Ms. DiNunzio did
9 that you felt was retaliatory for making complaints about her
10 was the fact that she took you off the leadership academy and
11 compliance ambassador, right?

12 A Yes.

13 Q Do you remember in that December 18th or 19th meeting with
14 Ms. DiNunzio she told you that she was concerned that you were
15 involved in too many projects and initiatives?

16 A Yes, she told me that.

17 Q And she told you that you would need to prioritize making
18 the necessary adjustments to your district when your district
19 wasn't performing, right?

20 A I believe there was a discussion on that.

21 Q And she told you in December that you needed to focus on
22 performance above anything else, right?

23 A Yes. Profits. Yes.

24 Q She told you to prioritize district performance above
25 everything else by limiting yourself to one project or

S. Ivie - X

1 initiative, correct?

2 A Oh, I thought that was a statement. Yes.

3 Q Did you agree with Ms. DiNunzio that your highest priority
4 as a DSM was to focus on the performance of your district and
5 your team?

6 A Yes. Performance is important.

7 Q But you didn't immediately give up your leadership academy
8 role, did you, so that you could focus on the performance of
9 your team?

10 A I was in the midst of it.

11 Q Right. But you didn't give it up, right?

12 A No.

13 Q You didn't immediately give up your compliance ambassador
14 role so that you could focus on the performance of your team,
15 did you?

16 A No.

17 Q In fact, by February 2019 you still hadn't given up your
18 leadership academy role, correct?

19 A That's a national role. You don't necessarily walk away
20 when you are putting everything together for a national
21 meeting.

22 Q And by February 2019 you still hadn't given up your
23 compliance ambassador role, correct?

24 A No.

25 Q No, you had not given it up?

S. Ivie - X

1 A No.

2 Q You would agree that the leadership academy role took up a
3 lot of your time, correct?

4 A It is a very honorable and big deal in AstraZeneca to be
5 asked on this leadership academy.

6 Q And you would agree, would you not, that it took up a lot
7 of your time?

8 A Yes. It does take a lot of time, because you are
9 presenting to senior leadership, you are doing your own slides,
10 you are up on the stage. This is a big deal. This is your
11 next step to moving up the career ladder.

12 Q And you were more focused on that than improving working
13 with your team in the field 80 percent of the time, right?

14 A I did have to work on that too. It was very much known.
15 My team was doing really well, I think, the first part of 2019.

16 Q But you had been told to spend 80 percent of your time in
17 the field with them, right, and give up these other roles?

18 A Yes.

19 Q Okay. So let's see. When you come back from your --
20 first of all, let's look at Exhibit 81. Your attorney
21 suggested -- Mr. Oswald suggested in an earlier questioning
22 that Exhibit 81, which was a complaint -- another compliance
23 complaint filed on February 5th, 2019 -- do you remember this
24 complaint? It is another anonymous complaint?

25 A I don't get this. I don't see it. I only see it here.

S. Ivie - X

1 Q We will get it. There you go.

2 So "we are being asked to unethically expand our
3 patient base in order to increase our market share. I am being
4 asked to illegally ask for patients outside of our indication."

5 That was you who made that complaint, right?

6 A It was.

7 Q Mr. Oswald had suggested earlier that maybe there was a
8 second person who was making these complaints. There was no
9 second person, right?

10 A I made the complaint of the anxiety and depression.

11 Q So that was you. The anxiety and depression?

12 This complaint that was being made that's in front of
13 you, that was your complaint and not a second person?

14 A Yes.

15 Q Now, when you returned from leave, you complained to HR
16 about a number of things, right --

17 A Yes.

18 Q -- that you thought were retaliatory against you?

19 A Yes.

20 Q -- including the 150 days had gone to 160 days, right?

21 A I had not received notification except with Stephani.

22 Q Right. And Karen Belknap investigated those complaints,
23 right?

24 A About the 150 days?

25 Q Yeah. I think she had eight or nine of them that we went

S. Ivie - X

1 through. Don't worry. I'm not going to go through them all.
2 That was one of them. You had complained that you thought it
3 was retaliatory, and she investigated that complaint, right?

4 A The 150 to 160, yes.

5 Q Yes. And she told you that it applied not just to you but
6 to everybody else, right?

7 A Yes.

8 Q So it wasn't retaliatory against you?

9 A I hadn't known. I didn't get any emails until Stephani
10 said, "You're going to have it from 150 to 160."

11 Q You also complained to human resources about Ms. DiNunzio
12 asking other DSMs, what you call, to train you, right?

13 A Yes.

14 Q In fact, she was only asking that they bring you up to
15 speed about things that you had missed out on while you were on
16 your leave of absence, right?

17 A I believe she said, "I have got the other district
18 managers that is going to train you."

19 Q If you look at Exhibit 94, we can see the actual email
20 that Ms. DiNunzio sent out, right? Here we go. Here is the
21 email, in the third column from Ms. DiNunzio to Blaire and
22 Genie and Andrew and Chris and Scott, copying you.

23 Here she writes: "Suzanne has returned to work
24 yesterday. As you know, many system updates, in addition to
25 brand and organizational changes occurred while she was on

S. Ivie - X

1 leave. To ease her transition, I would like each of you to
2 help bring her up-to-date with a specific topic. Suzanne will
3 reach out to coordinate and connect."

4 Then she goes through the various people and how they
5 are all going to bring you up to speed on the things you missed
6 while you are out, right?

7 A Yes.

8 Q Then she says, "Thank you for pitching in to make sure
9 that Suzanne has everything she needs to lead and coach her
10 team, Steph," right?

11 A Yes.

12 Q Now, you said you had difficulty accessing some of the
13 systems, but you had access to emails, right?

14 A I had, yes.

15 Q Ms. DiNunzio said that if you were having any difficulty
16 accessing the field coaching database, just send her an email
17 and describe the field coaching you had done, right?

18 A We talked about it. I did send her one coaching form, and
19 she told me, "Those don't count. They don't matter to me
20 unless they are in the coaching app."

21 Q Let's go to -- I'm going to skip through a whole bunch,
22 because we spent so much time with the other witnesses on this.
23 I am going to go to the appeal of the written warning, which we
24 didn't spend a whole lot of time on.

25 Exhibit 92. So you appealed the written warning that

S. Ivie - X

1 you received, correct?

2 A Yes.

3 Q And AstraZeneca assigned an investigator to handle the
4 appeal, correct?

5 A I didn't know that.

6 Q Okay. We will get to the interview with you in a second.
7 The investigator was Linda Abbonizio?

8 A She was the one that we sent it to.

9 Q Yes. And you met with her, right, in connection with your
10 appeal, correct?

11 A What do you mean I met with her?

12 Q I don't know. Meetings nowadays seem to be on a phone
13 call or Zoom or something. I don't know if we were doing Zoom
14 back then. But you had a conversation with her about the
15 appeal from the written warning, right?

16 A I can't remember if it was a conversation or just sending
17 it via email.

18 Q Well, Ms. Abbonizio has a summary here of the conversation
19 with you. Let's see if that helps. It was on June 3rd, 2019,
20 according to Ms. Abbonizio. "EPP," which we've learned stands
21 for Employee Practices Partner -- I think that's
22 Ms. Abbonizio -- "spoke with Ms. Ivie re her appeal and her
23 perspective on the action to place her on the first written
24 warning. Ivie alleges that she was unaware that her field
25 coaching days were 'out of sync with the rest of the team."

S. Ivie - X

1 You say that Ms. DiNunzio never had any discussions
2 with you about your field time, correct?

3 A That's what it says in here. But I don't think we talked.
4 Maybe we did. But I sure don't remember this conversation.

5 Q It would be pretty odd for her to make this whole thing
6 up, right?

7 A Yeah. I think it might have been a email. I don't know.
8 Keep going.

9 Q It says that you say to her -- according to this --
10 "Ms. DiNunzio never expressed any concerns about why you were
11 not in the field coaching your Boise reps," correct?

12 A Yes. There was additional conversation, right.

13 Q But none of those statements are accurate, right?

14 A Well, no, from what the questions you were -- there were
15 statements along with it.

16 Q But these ones are, at least, inaccurate, right? We have
17 gone over all the emails in which she tells you what you need
18 to be doing and how you are not doing it, right? I am not
19 going to go through all of those again.

20 A Okay.

21 Q So continuing on with this exhibit, bottom of page 3 and
22 the top of page 4, you said that you provide distant coaching
23 and virtual coaching to the Boise reps. Bottom of page 3.
24 Sorry.

25 So if you'd look at the very bottom of that page,

S. Ivie - X

1 "Ivie stated that she provides distant coaching to the Boise
2 reps." You understood, right, that distant coaching is not
3 coaching with customer engagement, true?

4 A Yes.

5 Q It is not observing the reps as they deliver their
6 presentations to the physicians, correct?

7 A Yes.

8 THE COURT: Excuse me. Do we need to break for our
9 three o'clock witness?

10 MS. RIECHERT: Fine with me.

11 THE COURT: Ms. Ivie, you may step down. Thank you
12 very much.

13 I'm not sure how quickly we can get the three o'clock
14 witness up and rolling.

15 Jury members, do you need a break or keep going?

16 THE CLERK: Judge, Pat has her ready actually.

17 THE COURT: Are you guys okay?

18 Thank you, Pat.

19 As a reminder, ladies and gentlemen of the jury, you
20 should consider deposition testimony presented to you in court
21 in lieu of live testimony in the same way as if the witness
22 were actually here in the box present to testify.

23 MS. CHAMBERS: Dr. Johnson, can you hear us?

24 THE WITNESS: Yes, I can.

25 THE COURT: We need to swear her in.

C. Johnson - D

1 MR. MCCARTHY: Your Honor, can I make one preliminary
2 request? Can I request that you instruct the jury as to
3 whether this witness is being offered as an expert or not?

4 THE COURT: Thank you.

5 What is this witness's name, Ms. Chambers?

6 MS. CHAMBERS: Dr. Cheryl Johnson.

7 THE COURT: Is she being offered as an expert?

8 MS. CHAMBERS: No.

9 THE COURT: Ladies and gentlemen of the jury, you may
10 consider her testimony as a lay witness, not an expert witness.

11 Thank you.

12 THE CLERK: Ms. Johnson, this is the clerk. Would
13 you raise your right hand, please.

14 (The witness was duly sworn and testified via video
15 conference.)

16 THE CLERK: Thank you. Please state your name and
17 spell your last name for the record.

18 THE WITNESS: Dr. Cheryl Johnson. J-O-H-N-S-O-N.

19 THE CLERK: Thank you.

20 DIRECT EXAMINATION

21 BY MS. CHAMBERS:

22 Q Good afternoon, Dr. Johnson. What type of medicine do you
23 practice?

24 A Family practice.

25 Q How many years have you been practicing?

C. Johnson - D

1 A 27.

2 Q Approximately how many patients do you have?

3 A I don't know.

4 Q Is Suzanne Ivie one of your patients?

5 A Yes, ma'am.

6 Q Do you recall Suzanne Ivie specifically?

7 A Yes, I do.

8 Q Do you keep detailed and accurate notes on your patients?

9 A Yes.

10 Q I would like to show you Plaintiff's Exhibit 129, and I
11 believe I sent you a hard copy prior to today. Do you have
12 that in front of you? It should also come up on the screen.

13 A I do have it.

14 Q And if we could -- what is this document?

15 A That's a progress note from an office visit on
16 October 18th, 2019.

17 Q Okay. And this document had several pages, right? Is it
18 correct that this is the full medical record?

19 A Yes.

20 Q I would like to turn to page 12 of 24. It should be --
21 yes, there we are. Do you see that on the screen?

22 A Yes, I do.

23 Q And it has a visit date of March 1st, 2019; is that right?

24 A Yes.

25 Q And are these the notes of you or your staff?

C. Johnson - D

1 A Yes.

2 Q And based on these notes, why did Ms. Ivie come into your
3 office?

4 A It says at the top for migraines, to discuss insomnia, her
5 cholesterol.

6 Q Where it says "history of present illness" in the third
7 paragraph there, it says, "Anxiety and depression worse in the
8 last one to two months. Multiple migraines daily. Hard to
9 drive safely due to migraines with aura and emesis. Hard to
10 look at a computer screen. This has caused increased stress.
11 Anxiety and depression."

12 Do you see that?

13 A Yes.

14 Q And those are the notes from your office?

15 A Yes.

16 Q Okay. And what does dysphoria mean?

17 A Are you looking under the physical exam?

18 Q Yes.

19 A My statement?

20 Q Yes.

21 A Uneasy; unhappy.

22 Q Got it. Then it says, "Anxiety and depression worse in
23 the last two months."

24 Again, those are your notes?

25 A Yes.

C. Johnson - D

1 Q Okay. Based on these medical records, did you diagnosis
2 Ms. Ivie with anxiety and depression, Dr. Johnson?

3 A I'm looking at this. Sorry. I'm looking at the rest of
4 that office visit. I wanted to make sure we are looking at the
5 right date. I did start her on medications on those dates.

6 Q Under "history of present illnesses," it also says, "Sees
7 pain specialist for migraines."

8 Do you see that?

9 A Yes.

10 Q So are you aware that she saw a specialist for her
11 migraines?

12 A Yes, a neurologist. And she was getting Botox injections,
13 where it says that on the line above.

14 Q We can take this exhibit down. Thank you.

15 Do you recall Ms. Ivie saying anything to you about
16 work?

17 A I do. I'm not sure if it was this visit or the follow-up
18 visit, but I do remember her mentioning work and stress at
19 work, not anything really more specific than that, and I didn't
20 write it in my note. But I do recall her speaking about some
21 stress at work.

22 Q Okay. And do you recall if she talked to you about her
23 migraines worsening?

24 A Yes.

25 Q Okay. And was this around the March 2019 time frame?

C. Johnson - X

1 A Yes.

2 Q All right. Just again, the exhibit that we looked at,
3 129, that's an accurate copy of Ms. Ivie's medical records from
4 your office?

5 A I'm sorry. You said 1-29?

6 Q No. I'm sorry. I'm referring to the Exhibit No. 129.
7 That's the number document you have there. I want to confirm
8 that's an accurate record from the medical records from your
9 office?

10 A Yes, it is.

11 MS. CHAMBERS: Thank you. No further questions.

12 MR. MCCARTHY: Briefly, Your Honor. Can I have a
13 moment? And can we switch the exhibit display, if possible?

14 CROSS-EXAMINATION

15 BY MR. MCCARTHY:

16 Q Good afternoon, Dr. Johnson. I'm Ryan McCarthy. I'm one
17 of the lawyers for AstraZeneca. How are you?

18 A I'm doing okay.

19 Q I want to bring you back to a portion of Plaintiff's
20 Exhibit 129, if I may. I think it is that same March 1st,
21 2019, progress note.

22 A Okay.

23 Q I'll try to put it on the screen here. This is the
24 exhibit that you looked at, or one of the pages that you looked
25 at with Ms. Chambers, correct?

C. Johnson - X

1 A It is not in focus on mine.

2 Q I'll try to make it bigger. Is that a little better?

3 A That's a lot better. Thank you.

4 Q Did you testify a few minutes ago that you thought you
5 diagnosed Ms. Ivie with anxiety and depression during the
6 office visit on March 1st, 2019?

7 A Yes. I started her on medication, lamotrigine.

8 Q Do you see where it says -- there is a section that says
9 "chief complaint"?

10 A Yes.

11 Q In your experience, what goes under that section of your
12 progress note?

13 A The main thing that the patient first describes that they
14 are there for.

15 Q And that lists migraines, lipids, insomnia, and diabetes?

16 A Yes.

17 Q And at least under there, there is nothing about anxiety
18 and depression?

19 A Under the chief complaints, no.

20 Q Under "past medical history," there is a list of disease
21 names and dates of onset?

22 A Yes.

23 Q Is anxiety and depression in there?

24 A No.

25 Q I want to show you -- I think this is page 14, if you are

C. Johnson - X

1 following along. Around the middle of the page, there is a
2 section that says assessment?

3 A Yes.

4 Q What do you put in that section?

5 A Those are some of the conditions that I am addressing in
6 the office visit.

7 THE COURT: Ma'am, you broke up. Could you repeat
8 that answer, please.

9 Dr. Johnson, can you hear us?

10 THE WITNESS: I hear you.

11 THE COURT: I'm sorry. Ma'am, your last answer to
12 Mr. McCarthy broke up. Could you repeat it, please.

13 THE WITNESS: Those are some of the conditions that
14 I'm addressing in the office visit.

15 THE COURT: Thank you.

16 BY MR. MCCARTHY:

17 Q Are those diagnosis codes there as well?

18 A Yes.

19 Q Is that a complete list of the diagnoses that you made on
20 that office visit?

21 A Oh, I should have put anxiety on there. I did start
22 her on medication for it. That's what the lamotrigine is
23 for.

24 Q The medical records, you would agree, don't reflect a
25 diagnosis of anxiety and depression at this office visit?

C. Johnson - X

1 A It is not in the assessment. However, I started her on
2 medication for it. The next office visit was for a follow-up.

3 MR. McCARTHY: Nothing further.

4 THE WITNESS: But I get what you are saying. The
5 word is not there.

6 THE COURT: Thank you, Dr. Johnson.

7 Any redirect?

8 MR. OSWALD: No.

9 THE COURT: May this witness be excused?

10 MR. OSWALD: Yes.

11 THE COURT: Thank you. I appreciate your time this
12 afternoon.

13 THE WITNESS: Anything else?

14 THE COURT: No. You are finished with us.

15 Thank you.

16 (The court reporter requested a recess.)

17 THE COURT: Let's take a fast break. I want to thank
18 the jury.

19 (Recess.)

20 (Open court; jury present:)

21 THE COURT: Swear the witness.

22 (The witness was duly sworn.)

23 THE CLERK: Thank you. Would you please state your
24 name for the record, spelling your last.

25 THE WITNESS: Jenny Lee Capell: C-A-P-E-L-L.

J. Capell - D

1 DIRECT EXAMINATION

2 BY MS. CHAMBERS:

3 Q Good afternoon, Ms. Capell. Can you please introduce
4 yourself to the jury.

5 A Yes. My name is Jenny Capell.

6 Q How do you know Suzanne?

7 A Our boys play basketball together.

8 Q When did you meet Suzanne?

9 A 2017. Early 2017.

10 Q And how old were your sons when they were playing
11 together?

12 A Like 12, 13, 14. They played for a few years.

13 Q And how frequently would they play basketball together?

14 A They were on the club team, and so they were playing games
15 two to three days a week with practices. So I would see
16 Suzanne probably three or four days a week.

17 Q Okay. And so you would see her at practice sessions and
18 games?

19 A Yes.

20 Q So when you saw Suzanne at games, would you talk to her?

21 A Yeah. We would always sit by each other for the most
22 part.

23 Q And how often did Suzanne attend games?

24 A Usually all the games. We both, I think, really enjoyed
25 watching basketball.

J. Capell - D

1 Q And would she ever miss a game?

2 A No, not usually.

3 Q Did she ever talk to you about work?

4 A No.

5 Q And initially in this 2017 time frame, what was her
6 demeanor like when she would attend games?

7 A Just cheery and chatty. We would just chat about our boys
8 and sports.

9 Q Would you generally talk throughout the game while you
10 were watching?

11 A Yeah, we would.

12 Q Did you start to notice a change at all?

13 A I did, yeah.

14 Q Around when was that?

15 A Probably like -- maybe the end or last part of 2018.

16 Q Okay. And what did you see?

17 A She quit coming to as many games. And I just figured, she
18 quit coming to as many games. When she would come, she didn't
19 sit by me as much and then sometimes she was leaving partway
20 through the games I noticed.

21 Q When you say that she wasn't coming to as many games as
22 before, you were saying she was coming to every single
23 basketball game. And when she was coming less, how frequently
24 would she come?

25 A A game or two a week probably.

J. Capell - D

1 Q When she was at games, you said before you would sit
2 together and talk throughout the games. Towards the end of
3 2018 and into 2019, what was -- so she wouldn't sit by you as
4 much, right?

5 A Yeah.

6 Q And did you ever try to sit by her when she was coming to
7 the games less?

8 A Yeah. I would -- if I came in after her, I would always
9 probably go sit close to her, because we always had.

10 Q During that time do you remember anything?

11 A Yeah. There was -- she was -- she would need Tums, which
12 was a new thing. She was getting worked up over the games, and
13 the boys were -- they were just young games; they weren't
14 important games. And so I teased her that she needed Tums,
15 because she was getting so upset about the games.

16 Q Did you ever ask her if anything was wrong?

17 A I did not.

18 Q Why not?

19 A I don't know. I just didn't.

20 Q Did you find the change in her behavior strange?

21 A I mean, to be honest, all I did was notice it. We never
22 hung out outside of basketball. So I noticed the change, but
23 it didn't -- it was different than she had been.

24 Q Okay. And you previously described her as being cheerful
25 and kind of pleasant at the game. Was she like that towards

S. Ivie - X

1 the end of 2018 and early 2019?

2 A She just seemed off and stressed -- yeah. It was
3 definitely different than what had been the year or
4 year-and-a-half before.

5 MS. CHAMBERS: Thank you, Ms. Capell. No further
6 questions.

7 MR. MCCARTHY: No questions. Thank you.

8 THE COURT: May this witness be excused?

9 MS. CHAMBERS: Yes.

10 MR. MCCARTHY: Yes, Your Honor.

11 THE COURT: You are excused. I appreciate it.

12 MS. CHAMBERS: Should Ms. Ivie go back on the stand?

13 Ms. Ivie, go ahead and come up and have a seat. I
14 will remind you that you are under oath.

15 Thank you. You may remove the mask.

16 BY MS. RIECHERT:

17 Q Before the break, we were talking about the appeal of the
18 written warning and the notes from Linda Abbonizio with respect
19 to that appeal. Then we were talking about the bottom of
20 page 3. I think we finished that at the top of page 4. Maybe
21 we should start at the bottom of page 3 so I can get the
22 context.

23 It goes on to state, "Ivie stated that she felt
24 blindsided by the written warning. Ivie stated in her virtual
25 coaching she discusses pre-call planning with the reps and

S. Ivie - X

1 discussed communication and collaboration between the partners,
2 focuses on Engaging With Insight. Ivie stated she does not
3 participate on calls virtually. She talks to reps at the
4 beginning of the day and then at the end."

5 So "did not participate in calls virtually," meaning
6 that you don't virtually appear at the doctors' offices with
7 the rep?

8 A Yes.

9 Q And that was true, correct?

10 A I do not.

11 Q "She talks to the reps at the beginning of the day and
12 then at the end. Ivie stated that she admitted to being out of
13 whack with her field coaching time but did not realize it was
14 an issue or that it would lead to a written warning. Ivie
15 stated that she thought she was doing the best for her region's
16 business by focusing on being prudent with travel budget. Ivie
17 stated she feels the written warning came about because of her
18 complaints regarding her CBD raised in December 2018 and feels
19 retaliated against for raising concerns. Ivie stated her
20 expectation is to have the written warning rescinded."

21 Then EPP reminds you of the process.

22 Let's go to Exhibit 143. So looking at Exhibit 143,
23 is this a copy of the letter you received on June 12th, 2019?
24 It is from Linda Abbonizio, I think -- maybe it was from
25 someone else -- with the results of the written warning?

S. Ivie - X

1 A Yes.

2 Q Do you remember receiving this?

3 A Yes.

4 Q It states that: "Ms. Abbonizio reviewed the relevant
5 documents, including the additional documentation you provided
6 on June 4th. In addition to reviewing the case management
7 file, she spoke with your district manager, Stephani DiNunzio,
8 on June 5th. The outcome of the appeal review determined that
9 you were not fully meeting your duties as a district sales
10 manager, based on the number of field coaching days available
11 versus actual field coaching days conducted as well as the
12 discrepancies between field coaching reports recorded and
13 travel expenses to reflect respective field coaching reports.

14 "Due to the concerns of not fully meeting the
15 expectations of your role, the process to place you on a first
16 written warning was appropriately followed by employment
17 practices and is consistent with AstraZeneca practice.

18 "Therefore, based on the circumstances, I am
19 upholding the decision of the first written warning. This
20 decision is considered final in terms of our appeal process.

21 "Ms. Ivie, I appreciate this may not be the response
22 you were seeking; however, we appreciate the opportunity have
23 you provided employment practices to objectively review the
24 matter on your behalf.

25 "Thank you."

S. Ivie - X

1 Now, let's switch subjects and talk about emotional
2 distress. As I think your doctor just -- your friend, Jenny,
3 just testified, you started acting differently towards the end
4 of 2018, right?

5 A Yes.

6 Q And you first started experiencing symptoms of anxiety and
7 depression in like September or October of 2018, correct?

8 A Yes.

9 Q It was at that time that you were not meeting your
10 numbers, and the performance of your team was suffering,
11 correct?

12 A Yes. And other things, yes.

13 Q This was a stressful time for you, because you were having
14 a bad second half of the year, right?

15 A I've had bad second halves before.

16 Q But this was one was a bad second half of the year, right?

17 A Yes.

18 Q And you saw the numbers every month?

19 A Yes.

20 Q And they weren't good, right?

21 A Right.

22 Q So you would agree it's not surprising that you were
23 stressed at that time, correct?

24 A For 19 years, I have had up and downs, and I never had
25 this type of up and down.

S. Ivie - X

1 Q But you would agree that the problems you were facing in
2 2018 towards the end with the numbers and everything, that that
3 would be stressful, right?

4 A I wouldn't relate it off the numbers.

5 Q But at least part of it?

6 A A little part.

7 Q Okay. And that was before you made the hotline complaint
8 in December 2019, right -- '18? Sorry.

9 A I'm sorry? Repeat that.

10 Q The fact that you were having the symptoms of anxiety and
11 depression, that was before you made your hotline complaint in
12 December of 2018, right?

13 A Yes. Things were escalating.

14 Q Before you made your complaints to human resources in
15 2019, right, the ones Ms. Belknap and Ms. Ceaser talked about,
16 correct?

17 A Was I having depression and anxiety before that?

18 Q Yeah, before that.

19 A Yes.

20 Q And before Ms. DiNunzio knew about any of your complaints,
21 right, the complaints that you made on the ethics line?

22 A On the ethics line? The December one or August?

23 Q The December one was the only one you made on the ethics
24 line.

25 A Does DiNunzio know I had the depression and anxiety there?

S. Ivie - X

1 Q You had the depression and anxiety before she knew you
2 made the ethics complaint about her?

3 A Yes.

4 Q And so you were having the anxiety before any retaliation
5 could have started, with respect to the ethics you filed in
6 December and the leave of absence and the complaints that you
7 filed in April and May, right?

8 A Everything was escalating, yeah.

9 Q So after you were let go from AstraZeneca, you looked for
10 another job, right?

11 A Yes.

12 Q And in connection with some of these other jobs, you had
13 to fill out an employment application; is that correct?

14 A Yes.

15 Q And these employment applications sometimes asked you why
16 you left your prior job, right?

17 A Yes.

18 Q And they sometimes asked you if you had been fired by a
19 prior employer?

20 A Yes.

21 Q And if they had asked you if you had been fired, you said
22 no, right?

23 A Yes.

24 Q Even though that wasn't true?

25 A Yes.

S. Ivie - X

1 Q And you figured you could get in and kind of explain the
2 situation?

3 A Yes.

4 Q And in your job interviews you would sometimes tell
5 employers that you left the company to pursue other options; is
6 that correct?

7 A Yes.

8 Q Now, you talked -- and your expert is going to talk about
9 the fact that you hoped to be promoted?

10 A I'm sorry? Who is talking?

11 Q Your expert.

12 A Oh, expert. I'm sorry.

13 Q What were you hoping to be promoted to?

14 A In this company or when I was looking for a job?

15 Q At AstraZeneca. Sorry. I switched topics.

16 A Training and development. That was kind of, I guess, my
17 niche; also in compliance too. I was kind of looking at that
18 path too. But training and development was really my true
19 passion. I loved that.

20 Q And what training and development job would you be looking
21 to get?

22 A The CL&D that we referred to, training and development --
23 even like the new higher training and development/DSM
24 leadership. There's a whole lot of different paths.

25 Q Did you know if those jobs were promotions as opposed to

S. Ivie - X

1 lateral transfers?

2 A Yes, they are.

3 Q What level job were you looking at?

4 A Level? I don't know the level.

5 Q How did you know they were promotions?

6 A Oh, they're leadership positions. It is more of a
7 national range, so they're promotions.

8 Q It was because it was a national as opposed to a --

9 A No, they are promotions. When you are getting another
10 job, and you are moving up in the company, those are called
11 promotions.

12 Q Right. I'm trying to find out why you thought these jobs
13 were promotions that you would be moving up as apposed to
14 moving across?

15 A Most of them are DSMs. They get promoted up there and
16 then go into -- well, DSMs can also go into branding and
17 marketing.

18 Q So you don't actually know that they were promotions,
19 right?

20 A They were promotions. When you go and interview, and you
21 are going up in the company, that would be considered a
22 promotion.

23 Q If you were going up as opposed if you were going lateral.

24 A What is your question?

25 Q I'm trying to understand why you thought it was a

S. Ivie - X

1 promotion.

2 A Because that's how we refer to it. When I'm getting
3 promoted, nobody says, "Oh, they are moving to a lateral
4 position to start training all new PSSs." It is a promotion.

5 Q That's what people told you?

6 A That's what we say when people announce they are moving to
7 a higher level.

8 Q But you don't know it is a higher level, right? You just
9 heard the word "promotion."

10 A It is a higher level going to do that.

11 Q Did you know that those jobs were in Delaware?

12 A Yes. But most of them are remote.

13 Q And that was before COVID?

14 A Yes.

15 Q Who did you know that was working remotely?

16 A I think it was Kevin and -- we were trained on different
17 products, and they were doing Zoom calls before COVID. They
18 would be out of their homes, and we would be doing our Zoom
19 calls and training and different things like that.

20 Q Do you know where they were working?

21 A I can't remember. They are just all over the country.
22 There was a main division up in Delaware, but I'm thinking they
23 even closed that. Some of it is -- I mean, it is remote-based.
24 They pretty much closed the entire plant in Delaware.

25 Q There was testimony earlier about you being in a bathroom

S. Ivie - X

1 off a lobby in a hotel. Where was that?

2 A It was in a hotel in downtown.

3 Q Downtown --

4 A Salt Lake City.

5 Q And with respect to the "wrinkles" comment or "lack of
6 wrinkles" comment that was made, I think you said that was in
7 April of 2018. Was that when you were interviewing somebody
8 for a job or something?

9 A Yes. It was the March/April time frame.

10 Q Where was that located?

11 A Little America Hotel.

12 Q What is it called?

13 A Little America in Salt Lake.

14 Q You said you had had a call with Ms. DiNunzio
15 and Ms. Broussard about these insights in August of 2018.

16 Do you remember that?

17 A Yes.

18 Q And were you in your home office then?

19 A Yes.

20 Q You said you went to visit -- on a visit with
21 Mr. Griffith, and he talked about DALIRESP. You said he wasn't
22 qualified to do that, because he hadn't been trained on that.

23 Do you remember that?

24 A I didn't say that.

25 Q I thought there was something you went on -- sorry. That

S. Ivie - X

1 was Linda. Sorry. I am getting my witnesses mixed up.

2 When you went to district meetings, where were they
3 located?

4 A Salt Lake, Sandy. I think there was one in Beaver.

5 Q Those were all in Utah?

6 A Yes. I don't think we had any in Boise or Oregon or
7 anything.

8 Q And then you said you had a meeting with Ms. Belknap and
9 Ms. DiNunzio in February of 2018 -- February of 2019. Were you
10 in your home office then?

11 A I was.

12 Q And then when you were on your termination -- when you
13 were notified you were being terminated by Mr. Gray and
14 Dawn Ceaser, were you in your home office?

15 A Yes.

16 Q You said there was a call on May 3rd with Ms. Belknap and
17 Ms. Ceaser. We talked about that. Were you in your home
18 office then?

19 A Yes. Most of the HR calls, I was not about ready to do it
20 in the field. It is very uncomfortable.

21 MS. RIECHERT: No further questions.

22 THE COURT: Redirect.

23 MS. CHAMBERS: Thank you.

24

25

S. Ivie - ReD

REDIRECT EXAMINATION

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BY MS. CHAMBERS:

Q So you were asked about the Benatar nickname for some time, and we saw some text messages in January 2018, right?

A Yeah.

Q And it seems like you really liked the text messages -- sorry -- the nickname. Why did you send those text messages?

A She was new to her role, and I wasn't going to rock the boat with a new manager. I think it was just going to be that one thing. I didn't want to rock the boat.

Q And how long were you called "Benatar" by Stephani?

A Well, this was in January when this first came about. Then she mentioned something in March. It was periodic, here and there. Then in September, she presented me with a water bottle that said "Benatar" at a district meeting and then, I guess, in January.

Q And so there was also some talk about the Boise, Idaho, team. That team was struggling performance-wise, right?

A It had performance issues, but the bigger issue was teaming.

Q What do you mean by "teaming"? What does that mean?

A I had a full-time rep and then a flex-time rep is what we call it. They weren't communicating at all. The full-time representative told the part-time representative, I guess, some lies. So she didn't believe him. He was continuing on, saying

S. Ivie - ReD

1 that he was doing something, and he didn't do it. So she got
2 very upset, and they stopped communicating. And in the
3 territory, they've got to have high communication, because they
4 are working together with lunches, just the routing, having a
5 discussion about physicians. If a physician needs something,
6 the other one comes in and helps. And they weren't doing it.
7 They were like their own little silos.

8 So I talked with her, and I said, "We have got to
9 resolve this. We have got to play nice in the sand box." So I
10 was watching them very carefully, because it was really
11 disruptive to the territory, to performance. Nobody knew what
12 either one of them was doing. So they had to have that
13 communication. So I was following them very closely, and I
14 would bring them together on calls so they could talk about
15 their performance, where they're routing, and so I watched them
16 very carefully that way.

17 Q To confirm, the issue with your PSSs in Idaho was not with
18 their interactions with the doctors but rather kind of --
19 rather inner-team?

20 A It was total inner-team issues.

21 Q And then there was a mention of the increase of field
22 coaching days from 150 to 160 and that that change occurred
23 across the board for everyone, right?

24 A Yes.

25 Q But you were the only person that was required to do

S. Ivie - ReD

1 100 percent in the field training when you returned from
2 medical leave, right?

3 A Yes.

4 Q And then we've talked about the 80/20 rule. So in your 19
5 years, you came to talk and know other DSMs?

6 A Yes.

7 Q Did anyone ever talk about the 80/20 split as a rule or
8 requirement for coaching?

9 A No.

10 Q Do you know of anyone who was disciplined -- and this has
11 been your 19 years at AstraZeneca -- for not meeting about the
12 80/20 split?

13 A No.

14 Q And then Ms. Riechert asked you a little bit about
15 emotional distress, and we also heard some earlier testimony
16 from Ms. Belknap about what she thinks of employees who go on
17 medical leave. And we've also talked to your doctor. During
18 that early 2018 time frame, did you go to the emergency room?

19 A Yes.

20 Q And what was that for?

21 A It was for -- I believe it is called cluster migraines.
22 It would be one and then it would be another one and then
23 another one and another one, and I couldn't get out of the
24 cycle of it.

25 Q And had you ever gone to the emergency room for your

S. Ivie - ReD

1 migraines?

2 A Not for that.

3 Q And did your husband write a letter to your doctor about
4 your migraines?

5 MR. McCARTHY: Objection. Hearsay.

6 THE COURT: Is your mic on?

7 MR. McCARTHY: It may be a premature objection. I'm
8 objecting to hearsay. I think Your Honor recalls the prior
9 discussion. I don't know how the witness is going to answer
10 the question. Just out of caution, we are objecting to
11 hearsay.

12 BY MS. CHAMBERS:

13 Q I am asking if you are aware that your husband wrote a
14 letter to one of your doctors?

15 A Yes.

16 Q Finally, do you feel that you were being asked to put
17 profits over people?

18 A Yes.

19 Q Do you think that's why you were terminated?

20 A Yeah.

21 MS. CHAMBERS: Thank you. No further questions.

22 THE COURT: Any recross?

23 MS. RIECHERT: A couple. Never trust a lawyer who
24 says they have a couple of questions.

25

S. Ivie - ReX

1 RE CROSS-EXAMINATION

2 BY MS. RIECHERT:

3 Q The 80/20 rule only came into effect in 2017, correct?

4 A I believe so. I had coaching days, and those were not
5 specified by customer -- by customer engagement.

6 Q So it is not really surprising that in your 19-year career
7 that you didn't hear of other people being disciplined for
8 violating it, right?

9 A It goes through -- it goes through the sales force. There
10 are some rumors.

11 Q But you didn't hear any rumors about anybody being
12 disciplined. But you wouldn't know if somebody was
13 disciplined --

14 A Sure. They would not contact me.

15 Q With respect to the migraines, you started having
16 migraines in 2012, right?

17 A Yes.

18 Q And you have been on migraine medication since 2012?

19 A Yes.

20 MS. RIECHERT: No further questions.

21 THE COURT: Thank you.

22 May this witness be excused?

23 MS. CHAMBERS: Yes, please. We would like to call
24 our next witness.

25 THE COURT: Thank you, Ms. Ivie.

J. Gibb - D

1 MR. OSWALD: We would like to call Ms. Judy Gibb.

2 THE COURT: Ms. Gibb, if you would hold on for one
3 second.

4 Thank you.

5 Ms. Gibb, please step forward and prepare to be
6 sworn. You can step up into the box, and you may remove your
7 mask if you are comfortable.

8 (The witness was duly sworn.)

9 THE CLERK: Thank you. Would you please state your
10 name for the record, spelling your last.

11 THE WITNESS: Judy Gibb. G-I-B-B.

12 DIRECT EXAMINATION

13 BY MS. CHAMBERS:

14 Q Good afternoon, Judy. Can you please tell us what you do
15 and introduce yourself to the jury.

16 A My name is Judy Gibb. And I have my own company. I am a
17 security consultant, so I design and project manage
18 multi-platform network security systems for big companies.

19 Q How do you know Suzanne Ivie?

20 A Sue and I went to college together.

21 Q Did you all live together?

22 A We did.

23 Q So how long have you known her?

24 A I have known Suzie 30-some-odd years. I am dating myself.
25 Sorry.

J. Gibb - D

1 Q So how often do you see or speak with her?

2 A Well, normally we try to get together as a group. There
3 is five of us; sometimes six. But there is a group of five of
4 us that went to college. We try to have girls' weekends. But
5 life is busy. We have kids and families and jobs. We used to
6 do it every year. Then it went to every other year. But the
7 last time we got together was 2019. We have a group text that
8 is ongoing -- birthdays, Mother's Days, holidays and whatever.
9 We call and text each other when we have time. But I have not
10 seen Suzie since 2019.

11 Q How would you describe Suzanne?

12 A As a person, she is one of my best friends. She is
13 amazing. I would probably describe her as a driven
14 professional. She loves her job. She loves her family. She
15 loves her church. She does everything. She does it all.

16 Q And what do you know about Suzanne's career? What would
17 she tell you?

18 MR. McCARTHY: Objection. Hearsay.

19 THE COURT: Sustained.

20 Move on, please.

21 BY MS. CHAMBERS:

22 Q You said she was very driven?

23 A Yes.

24 Q Can you explain that more.

25 A She has always been very career-minded. She was one of

J. Gibb - D

1 the first of us to start her career as a sales or -- a
2 pharmaceutical rep. I never really asked specifically what her
3 "rep" was, but she was always very work-oriented. She traveled
4 a lot and was always very happy about what she did.

5 Q So you talked about girls' trips and the last time you saw
6 Suzanne was 2019; is that right?

7 A That's correct.

8 Q Was there a girls' trip in 2019?

9 A Yes.

10 Q And where was this?

11 A This was at actually in Utah, and we usually stay at Sue's
12 house, because she has the biggest house to fit us all.

13 Q What did you see -- what did you personally observe about
14 her behavior during that trip?

15 A Sue had a lot more migraines. She used to get them every
16 once in a while, but it seemed like the whole time we were
17 there she was quiet. She was somewhat withdrawn. She didn't
18 stay with us up late like we normally do. We all like to sit
19 on the floor and hang out and talk and stay up really late,
20 because we want to reconnect. We haven't seen each other for a
21 while. She went to bed early. She didn't eat that much, and
22 she just seemed kind of distracted.

23 Q And so is this different from how she is?

24 A Oh, definitely different.

25 Q What is she normally like during the girls' trips?

J. Gibb - D

1 A Very engaged, always laughing, always bubbly, cooking for
2 us, making plans. She is usually in the forefront of what we
3 are going to do for the time that we are there.

4 Q And after 2019 -- after the girls' trip, how was she in
5 terms of keeping in touch with you?

6 A I would say she was on a group chat but more "surfacey,"
7 if that's a word. Maybe like a part to a comment or maybe a
8 happy birthday or a smiley face, very little actual wording,
9 you know -- like how is it going; how are you -- but nothing
10 further.

11 Q And did you ever find out -- did you ever learn that
12 Suzanne was actually terminated from AstraZeneca?

13 A I did. One of the --

14 MR. MCCARTHY: Objection. Hearsay.

15 MS. CHAMBERS: I'm asking if she learned.

16 MR. MCCARTHY: She was starting to answer more than
17 that.

18 THE COURT: Rephrase, please.

19 BY MS. CHAMBERS:

20 Q At some point did you know that Suzanne was terminated
21 from AstraZeneca?

22 A I did at some point, yes.

23 Q What was your reaction to that when you learned that?

24 A Very surprised.

25 Q Why?

J. Gibb - D

1 A Because she loved her job; always has.

2 Q Did you ever think that she would be terminated from her
3 job?

4 A No.

5 Q Tell me why.

6 A Because Sue is one of the hardest workers I know. She is
7 always working. She loved it.

8 MS. CHAMBERS: No further questions. Thank you.

9 THE COURT: Thank you.

10 Cross.

11 MR. MCCARTHY: No questions.

12 Thank you.

13 THE COURT: May this witness be excused?

14 MS. CHAMBERS: Yes.

15 THE COURT: Thank you, ma'am. You may step down.

16 Call your next witness.

17 MS. CHAMBERS: Yes. Dawn Benson.

18 THE COURT: Ma'am, give us one second, please.

19 THE WITNESS: Sure.

20 THE COURT: Thank you. Okay.

21 Raise your right hand to be sworn.

22 (The witness was duly sworn.)

23 THE CLERK: Thank you. Would you please state your
24 name for the record, spelling your last.

25 THE WITNESS: Sure. My full legal name is

D. Benson - D

1 Laura Dawn Benson. B-E-N-S-O-N. I go by Dawn.

2 THE COURT: Scoot up and use the mic.

3 THE WITNESS: Sure.

4 DIRECT EXAMINATION

5 BY MS. CHAMBERS:

6 Q Good afternoon, Dawn. Can you please introduce yourself
7 to the jury and what you do.

8 A Sure. My name is Dawn Benson. I am a licensed clinical
9 social worker. I do mental health therapy. Currently the
10 population I work with is the junior high school kids.

11 Q How do you know Suzanne Ivie?

12 A Suzanne and I met -- I am going to age myself -- but
13 during freshman year 35 years ago, and we lived in the same
14 dorms. We lived on the same floor and became best friends.

15 Q And so how often do you see or speak to Suzanne?

16 A Suzanne and I have never fallen out of touch in the 35
17 years we have known each other. As kind of long-term life-long
18 friendships go, you go through periods of time when you might
19 not talk for a few months, because you're busy. I have always
20 stayed in touch and in close contact with her. It is through
21 phone calls, text messaging, seeing each other, spending time
22 together. Our friendship has been really consistent for this
23 entire time.

24 Q How would you describe Suzanne?

25 A I mean, Suzanne is one of the most amazing people I know.

D. Benson - D

1 We became fast friends. She is so -- she an amazing person.
2 She is organized. She is detail-oriented. She is a planner.
3 She is nurturing. She takes care of people. She is kind of
4 one of those people that can do it all and juggle it all. She
5 has always been an amazing career woman, an amazing mom, and an
6 amazing friend. She just kind of seems a little bit super
7 human, because she can manage it all, and she has kind of
8 excelled. I would say she has always excelled at everything
9 she has done -- in college, in her career, as being a mom, as
10 being a member of the community, as being a friend.

11 There is a group of us from college, and she has
12 always been "the mom" of the group. She is the person that
13 always just looks after everybody and takes care of everybody.
14 She is a great support and a great friend and always there
15 whenever you need her.

16 Q Do you remember when Suzanne got her job at AstraZeneca?

17 A You know, I'm not sure if I remember the exact year. I've
18 just always been -- Suzanne is that person that has known
19 always what she wanted to do and started doing it right out of
20 college. I don't remember the exact year. I know she had
21 worked for another company. I do remember when she made a job
22 change to AstraZeneca, and she was very excited about it and
23 felt like it was a good move.

24 MR. McCARTHY: Objection. Hearsay.

25 THE COURT: Sustained. Move on, please.

D. Benson - D

1 BY MS. CHAMBERS:

2 Q So it seems like you've kept in touch with Ms. Ivie --
3 with Suzanne during her career at AstraZeneca. Was there a
4 time that she seemed different to you than the normal Suzanne?

5 A Yes. Certainly -- let me make sure I understand what you
6 are saying. We had seen Suzanne. We kind of had like a girls'
7 reunion weekend. We do that. We have a group of friends from
8 college and every -- I don't know -- several years we get
9 together. It was one of those weekends. It was in July of
10 2019 and this time -- this time, we all got together at
11 Suzanne's house. I live in Utah, but our other friends came
12 from California and Idaho, and that's, at least face-to-face,
13 when she -- everything seemed very different that weekend. She
14 was just -- I don't know how much detail you want. She was
15 very different. She was very distracted. We could tell
16 something was wrong. Very not engaged. Very down. Very --
17 not really engaging and participating with the group like she
18 usually did. You know, college girl friends, no matter how old
19 you are, you stay up late and talk and laugh. She wasn't
20 engaging in that. We would ask but she was -- I think she was
21 trying to make us feel comfortable, but we could definitely
22 tell that something was very different.

23 Q Okay. And I think you touched on a lot of her behavior
24 that you observed. What did you witness about her, like her
25 energy level or her sleeping?

D. Benson - D

1 A Sure. Completely different. So energy level, like really
2 low energy. We would go for walks, and we would have talks,
3 and you could tell she was really not present, like very
4 distracted. Her mind was elsewhere. Again, typically she
5 would stay up late with us and talk and she didn't. She would
6 go to bed early. We went to a movie that weekend. She
7 fell asleep in the movie. It was a completely different
8 experience.

9 Q Thank you. That's helpful.

10 And after the girls' trip -- so that's in
11 July 2019 -- is there anything -- you said you kind of keep in
12 touch here and there. Was there anything that you noticed
13 about how she was keeping in touch or communicating with you?

14 A Definitely not -- she was not the one initiating contact
15 ever. She would -- we have a group text and she would not --
16 we have a group text. It's funny banter back and forth. Then
17 we tell each other about each other's lives. Her responses, if
18 she responded at all, were very "surfacey," not really giving a
19 lot of information what was going on in her life, not really
20 other than almost just being polite, which is not -- Suzanne is
21 a polite person, but with a life-long relationship you're
22 always kind of rubbing each other and just engaging more, and
23 none of that happened after that weekend.

24 Q And then at some point you learned that Suzanne was
25 terminated from AstraZeneca, right?

D. Benson - D

1 A Yes.

2 Q What was your reaction to learning that?

3 A I could not have been more shocked. Suzanne is not
4 someone that you would ever imagine would be terminated from a
5 job.

6 MR. MCCARTHY: I object to that character evidence.
7 There was a lot before, Your Honor. I was going to object.
8 But under Rule 404, the continued character evidence.

9 THE COURT: Move on, please.

10 MS. CHAMBERS: May I ask about -- I was talking about
11 her reaction.

12 THE COURT: I didn't catch that.

13 MS. CHAMBERS: May I ask her about her reaction to
14 the termination?

15 THE COURT: Her reaction? Yes.

16 BY MS. CHAMBERS:

17 Q Dawn, focus on how you reacted to the termination.

18 A Yeah. It was not something that I would ever have ever
19 expected about Suzanne. My experience of Suzanne is that she,
20 again, has excelled at everything. She is --

21 MR. MCCARTHY: Judge, apologies. Same objection.

22 THE COURT: Okay.

23 BY MS. CHAMBERS:

24 Q Let's move on here. You talked a little bit about 2019.
25 What have you observed from 2019 to the present in terms of

D. Benson - X

1 what you've seen of Suzanne in terms of her behavior, how she
2 is to you as a friend versus how she was in the past?

3 A Well, it has completely shifted. She is really shut down.
4 She is really withdrawn from us. She hasn't been able to spend
5 time. I mean, we live in the same state, and so of all the
6 friends, we would be the ones that would get together and spend
7 time together, but she has been very withdrawn and very shut
8 down and really closed off. And it was completely out of
9 character. Like I said, she has always been the person who
10 took care of us.

11 MR. MCCARTHY: Objection, Your Honor.

12 THE COURT: Sustained.

13 MS. CHAMBERS: Thank you, Dawn. I don't have any
14 further questions.

15 Thank you.

16 THE COURT: Thank you. Cross-examination.

17 CROSS-EXAMINATION

18 BY MR. MCCARTHY:

19 Q Good afternoon, ma'am. Just two questions. Am I correct
20 that you never worked with Ms. Ivie?

21 A No.

22 Q And you testified a bit about her energy levels. Do you
23 recall that?

24 A Uh-huh.

25 Q Do you have any knowledge as to whether Ms. Ivie was

D. Benson - X

1 taking any prescription medications that might have affected
2 her energy level?

3 A Do I have knowledge if she was?

4 Q Yes.

5 A I don't have knowledge if she was.

6 MR. MCCARTHY: Thank you. Nothing further.

7 THE COURT: May this witness be excused?

8 MS. CHAMBERS: Yes. Thank you.

9 THE COURT: Thank you, ma'am. I appreciate your
10 time.

11 THE WITNESS: Thank you.

12 THE COURT: Next witness.

13 MS. CHAMBERS: Yes. Mr. Scott Severt.

14 THE COURT: Sir, if you could hold right there for a
15 moment, please.

16 Thank you, sir. Step forward and raise your right
17 hand to be sworn.

18 (The witness was duly sworn.)

19 THE CLERK: Thank you. Please be seated. Would you
20 please state your name for the record, spelling your last.

21 THE WITNESS: Scott Severt. S-E-V-A-R-T.

22 THE CLERK: Thank you.

23

24

25

S. Severt - D

DIRECT EXAMINATION

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BY MS. CHAMBERS:

Q Good afternoon, Mr. Severt. Can you introduce yourself to the jury and tell them what you do.

A Yes. I am a vocational rehabilitation consultant. For over 22 years, I have helped people to seek work. I work in the D.C. metro area.

Q Okay. Can you explain to us, what does a vocational rehabilitation expert do?

A Primarily for the first 15 or 16 years of my career, I helped people on workers' compensation seek new jobs, and so these people had disabilities, physical and cognitive. Then in the last five years, I've transitioned into doing this type of work where I help people who have other types of impairments in seeking new employment.

Q Okay. And are you a certified vocational rehabilitation expert?

A Yes. It is a national certification.

Q And in terms of your duties as a vocational rehabilitation expert, if a client comes to you, what are you doing?

A First, what I do, I interview the individual. I also review medical records, if there are medical records. I review their resume. I review their educational history, their work history, salary history, any training and certifications that they have, and I use that information to determine their

S. Severt - D

1 employability and earning capacity.

2 Q So I just want to talk about your educational background
3 briefly. Can you describe your educational history, any
4 undergraduate master's or post-master's degrees?

5 A Sure. I have a bachelor of arts in political science. I
6 have a master's in government. I have 18 credit hours of
7 rehabilitation counseling. That is what allowed me to sit for
8 the National Certified Rehabilitation Counselor Exam. I am
9 also a diplomate with the American Board of Vocational Experts,
10 which is an exam-based designation. I am a member of the
11 International Association of Rehabilitation Professionals. And
12 lastly, I am a certified life-care planner, which is also a
13 test-based designation.

14 Q And were you paid for your time speaking with Ms. Ivie?

15 A Yes.

16 Q And for your time in preparing your report?

17 A Yes.

18 Q And for your time today?

19 A Yes. I will bill for that.

20 Q Okay. Does the fact that you were paid for your time
21 alter your testimony in any way?

22 A No.

23 Q What's your professional hourly rate?

24 A \$350 an hour.

25 Q And how many hours did you spend on this case?

S. Severt - D

1 A As of June 15th, 27 and a half.

2 Q And have you testified on behalf of other individuals in
3 an expert witness capacity?

4 A Yes.

5 Q And how many times have you testified?

6 A In the past four years I have testified 21 times; eight in
7 Workers' Comp cases and 13 in other cases like this.

8 Q Were those cases in both state and federal court?

9 A Yes. I have testified in federal court, the Federal
10 District Court, Eastern District of Virginia; also the State of
11 New York, Maryland, Virginia, and the District of Columbia.

12 Q Have you ever testified in the District of Oregon?

13 A No.

14 Q Were you qualified as an expert in these previous cases?

15 A Yes, I was.

16 Q Were you ever denied or not qualified as an expert?

17 A No.

18 Q Have you previously testified for clients of the
19 Employment Law Group?

20 A Yes, I have.

21 Q Does that factual alter your opinions in this case in any
22 way?

23 A No.

24 MS. CHAMBERS: Judge, I would like to tender
25 Mr. Scott Severt in the field of vocational counseling and

S. Severt - D

1 vocational rehab.

2 THE COURT: Thank you.

3 MS. TALCOTT: No objection.

4 THE COURT: Thank you.

5 BY MS. CHAMBERS:

6 Q So I want to turn now to the bases of your opinion. What
7 were you asked to do in this case relating to Ms. Ivie's job
8 search efforts?

9 A I was asked to evaluate her efforts, look at the types of
10 jobs she applied to, and the feedback she got.

11 Q Did you interview Ms. Ivie prior to preparing a report?

12 A Yes. I interviewed her in 2019. I interviewed her five
13 times -- once in January of 2020 and five times in February of
14 2020. I also interviewed her four times in February of 2021
15 and June 11th of this year.

16 Q During the interview did you ask about her employment
17 history?

18 A Yes.

19 Q Her educational history?

20 A Yes.

21 Q Her certifications, courses, and training?

22 A Yes.

23 Q Did you review any documents in addition to speaking with
24 Ms. Ivie?

25 A Yes. I reviewed her resume. I reviewed her complaint. I

S. Severt - D

1 reviewed her W-2s. I reviewed her company benefits from
2 AstraZeneca. I reviewed, again, her job search efforts.

3 Q Okay. Can you walk us through the process by which you
4 made your assessment?

5 A Well, I listened to the feedback that she got from her job
6 search, and based on that, I calculated -- I estimated what I
7 thought she would be able to earn in a future position.

8 Q What factors did you consider in making your assessment?

9 A Well, again, I considered her work history, her education,
10 experience, the types of jobs she held. Her job search was
11 very important in that she had two excellent interviews with --

12 MS. TALCOTT: Objection. Hearsay.

13 THE COURT: Ms. Chambers.

14 MS. CHAMBERS: Hearsay doesn't apply to an expert.

15 MS. TALCOTT: It certainly does, Your Honor, if he is
16 relying on out-of-court statements.

17 THE COURT: What are you relying on, sir, to answer
18 the question?

19 THE WITNESS: I'm relying on my interview with
20 Ms. Ivie.

21 THE COURT: Overruled.

22 BY MS. CHAMBERS:

23 Q Let me go back to that question. Sorry. I was asking,
24 what factors did you consider in making your assessment?

25 A Well, she had two interviews early after her dismissal;

S. Severt - D

1 one with Amarin and one with Regeneron. They said she was head
2 and shoulders above the rest of the candidates. They discussed
3 salary and benefits to make sure.

4 MS. TALCOTT: Your Honor, objection. That's double
5 hearsay.

6 MS. CHAMBERS: Judge, under Rule 703, an expert can
7 rely on hearsay for their testimony.

8 THE COURT: Overruled. Continue, sir.

9 THE WITNESS: The two companies were discussing
10 salary and benefits with her, because they wanted to be certain
11 that the wages they were discussing were acceptable. They told
12 her they would check her references and employment history, in
13 anticipation of scheduling a follow-up interview in person, and
14 then they never called.

15 BY MS. CHAMBERS:

16 Q Did you assess whether Ms. Ivie's career advancement had
17 been affected by her termination from AstraZeneca?

18 A In my opinion her career has been adversely impacted by
19 her termination.

20 Q What sources of information are you using for that
21 analysis?

22 A My training, education, and experience, and also because
23 she is a whistleblower, whistleblowers are seen by other
24 employers as untrustworthy, troublemakers, and not a good
25 candidate.

S. Severt - D

1 Q How did you become aware of positions that would be
2 available to someone of Ms. Ivie's skill level?

3 A Again, I looked at her job search. I looked on Economic
4 Research Institute for positions with similar job titles as she
5 held, and that's how I looked at the types of jobs that she
6 could perform.

7 Q Okay. And so what is your -- I want to go to the
8 substance of your assessment. What is your assessment as to
9 Ms. Ivie's background and skill level?

10 A She has had an excellent work history: 27 years in the
11 pharmaceutical industry; 19 of that with AstraZeneca, and her
12 career was great up until the moment she was terminated.

13 Q Based on your assessment, is it likely that Ms. Ivie will
14 be able to obtain those types of positions?

15 A In my opinion, she will never work in the pharmaceutical
16 industry again, or it is more likely than not that she will not
17 work in the pharmaceutical industry again.

18 Q And what is your opinion as to her future employability?

19 A Apparently she is working part-time at BYU as a clinical
20 compliance coordinator for the nursing department. She is
21 hoping to go full-time. She may be able to get a full-time job
22 at the university. She has tried the pharmaceutical industry,
23 she has tried the bio-tech industry, and she hasn't had any
24 success. Recently I was told she had an interview as a
25 district sales manager in the pharmaceutical industry. The

S. Severt - D

1 referral was through a friend, and she was not chosen.

2 Q Okay. Does Ms. Ivie's termination from AstraZeneca
3 negatively impact her future employability?

4 A Yes. In my opinion, it does.

5 Q Again, can you state why.

6 A Because whistleblowers typically have to leave their
7 occupation, and also they have to settle for jobs of lesser
8 status and income, after all the attempts she has made. She
9 has applied for at least 149 jobs in nearly two years. She has
10 had excellent interviews. The first part of her job search
11 process, from termination until February of 2020, she applied
12 for approximately 112 jobs. She mostly focused -- 70 percent
13 were jobs at her level. 15 percent were below; 15 percent were
14 higher.

15 Then the second job search, from March 2020 until she
16 was hired by BYU, she had approximately 37 applications. She
17 got interviews for at least 25 percent of those. But those
18 positions were primarily of a lesser stature than she held
19 previously, and she still wasn't hired.

20 Q And so do you believe that Ms. Ivie will recover to the
21 level of salary that she enjoyed at AstraZeneca?

22 A No.

23 Q Why not?

24 A Again, because she is a whistleblower. Whistleblowers
25 suffer lifetime loss of earnings, and the things I described:

S. Severt - D

1 Employers view her as untrustworthy and just not a good
2 candidate to hire.

3 Q What class or types of positions will be available to
4 Ms. Ivie in the future?

5 A She could potentially work in managerial positions. But
6 again, she looked for managerial positions, and she did not get
7 them.

8 Q How long will it take Ms. Ivie to secure a position as a
9 pharmaceutical sales representative?

10 A In my opinion, she will never get a job as a
11 pharmaceutical sales representative.

12 Q What about in a manager's position?

13 A While it is possible she would get a managerial position
14 in another capacity, in another industry, so far, she has not.
15 But I do not believe she will get another managerial job in the
16 pharmaceutical industry.

17 Q Does Ms. Ivie's termination from AstraZeneca negatively
18 impact her future employability?

19 A Yes.

20 Q Again, in what way?

21 A Again, because now she is branded as a whistleblower.
22 People view her differently than had she remained in her
23 industry and with her company. So she has lost her tenure, so
24 to speak, her time and experience with that company and with
25 that industry, and that's something she will never regain.

S. Severt - D

1 Q Does Ms. Ivie's termination from AstraZeneca negatively
2 impact her present earning capacity?

3 A Well, it has. She earns \$27 an hour for a
4 17-and-a-half-week job, and she is hoping to get full-time.

5 Q And has there been any data or information changed since
6 you completed your report and assessment of Ms. Ivie?

7 A Not to my knowledge.

8 Q And how many reports have you written?

9 A I wrote the original report in February of 2020. I wrote
10 an addendum report in February of 2021 and another shorter
11 addendum report in May of 2021.

12 Q And have you reviewed any updated material since you
13 completed your report?

14 A Yes. I reviewed the economist's report for the defense.
15 I reviewed the rest of Ms. Ivie's job search efforts, and I
16 believe that was all.

17 Q And does your opinion still stand?

18 A Yes.

19 Q Is your opinion on the types of positions that Ms. Ivie
20 can expect to receive offers of employment and the compensation
21 that she is likely to receive in those positions within your
22 expertise?

23 A Yes.

24 Q Are you an expert in the job search process?

25 A Yes.

S. Severt - X

1 Q Are the opinions that you have expressed related to these
2 subjects within a reasonable degree of vocational
3 rehabilitation certainty or probability?

4 A Yes.

5 MS. CHAMBERS: One second. No other questions.

6 Thank you.

7 THE COURT: Thank you. Cross, please.

8 CROSS-EXAMINATION

9 BY MS. TALCOTT:

10 Q Good afternoon, Mr. Severt.

11 A Good afternoon.

12 Q You are not an economist; is that correct?

13 A That's correct.

14 Q And in coming to your conclusions, you relied primarily on
15 information you received from Ms. Ivie?

16 A That's correct.

17 Q Did you verify that any employers she applied for jobs
18 with knew she was a whistleblower?

19 A What occurred -- what typically occurs in these instances,
20 when the interviewer asks "why did you leave your last job," it
21 becomes a struggle to answer, because the job seeker -- it's
22 difficult to know how to frame an answer that will satisfy the
23 potential employer.

24 Q Mr. Severt, how did you verify that any employer that
25 Ms. Ivie applied a job with knew she was a whistleblower?

S. Severt - X

1 A I did not verify, but it is public information.

2 Q Were you aware that Ms. Ivie told employers falsely that
3 she was not fired?

4 A Early on, she told me that, and that is in fact what she
5 said; that she was not fired, yes.

6 Q Do you agree that it is best practices to independently
7 verify information you receive from a witness?

8 A It would be, but no one is going to give me that
9 information over the phone.

10 Q Well, did you review Ms. Ivie's sworn deposition testimony
11 before coming to your conclusions?

12 A Yes.

13 Q Her deposition is not listed in your report?

14 A I read her deposition between my first and second reports,
15 and if I didn't list it, I apologize.

16 Q Did you read the sworn deposition testimony of other
17 witnesses in this case?

18 A I don't believe so. I just read the economist's report.
19 That's the only one I can remember.

20 Q Did you review the annual reviews that Ms. Ivie received
21 while at AstraZeneca?

22 A I read some of them, yes.

23 Q Those are also not listed in your report; is that correct?

24 A Yes.

25 Q Other than the payroll records related to Ms. Ivie's job

S. Severt - X

1 at AstraZeneca, did you review any other records that
2 AstraZeneca provided in this case?

3 A Her W-2s.

4 Q So those are payroll records. Any other records not
5 related to her payroll and benefits that AstraZeneca provided
6 in this case?

7 A Not that I can think of right now.

8 Q Okay. So you assumed that Ms. Ivie, had she not been
9 terminated, that she would have remained in her job until she
10 retired at age 62; is that correct?

11 A Yes.

12 Q And you made that conclusion with 100 percent certainty?

13 A Well, anything is possible.

14 Q Did you do any research into whether AstraZeneca had any
15 layoffs of district sales managers since Ms. Ivie's
16 termination?

17 A I have not.

18 Q So you were not aware that AstraZeneca announced a
19 reduction in force or a layoff in 2020?

20 A I did not know that.

21 Q You did not know that AstraZeneca laid off district sales
22 managers, including one in the region that Ms. Ivie worked in,
23 in that reduction in force?

24 A She was the executive district sales manager.

25 Q But you are not aware that AstraZeneca laid off?

S. Severt - X

1 A No, I'm not.

2 Q And your report does not take into consideration the
3 possibility that Ms. Ivie's position could have been
4 eliminated?

5 A It's possible.

6 Q But you did not take that into consideration in your
7 report, correct, Mr. Severt?

8 A I didn't write that in my report, correct.

9 Q You also did not account for the possibility that Ms. Ivie
10 might have retired before age 62; is that right?

11 A This is possible also.

12 Q So let's shift gears and talk about the conclusion you
13 made that Ms. Ivie would have received a promotion. You made
14 that conclusion in your report; is that correct?

15 A Yes.

16 Q Specifically you assumed that Ms. Ivie would have been
17 promoted to the position of brand marketing leader or director
18 of sales training at AstraZeneca in 2022; is that correct?

19 A I'm not sure what year that was, but I did anticipate that
20 she would be promoted.

21 Q And you made that assumption with 100 percent certainty as
22 well; is that correct?

23 A I don't believe I said "100 percent certainty," but it is
24 possible that she wouldn't have gotten it. But she was being
25 groomed for the position because she was going to speak at a

S. Severt - X

1 leadership conference.

2 Q And that's information you obtained from Ms. Ivie?

3 A Yes.

4 Q And you did not independently verify that information; is
5 that correct?

6 A I don't know who else I would have asked.

7 Q You concluded in your report that Ms. Ivie would have had
8 an annual salary increase of \$50,000 to \$60,000 a year with
9 that promotion; is that correct?

10 A That's what Ms. Ivie told me.

11 Q Did you review any job descriptions or job requirements
12 for these positions to determine if Ms. Ivie was qualified for
13 them?

14 A I did not. I did see -- she sent me all of her materials,
15 but I didn't review specifically if she was qualified for the
16 positions that she applied to.

17 Q So you didn't conduct any independent research into the
18 education, training, or experience of individuals currently
19 holding those positions at AstraZeneca?

20 A Are you speaking of only jobs that were available through
21 AstraZeneca or the jobs she applied to in general?

22 Q Well, we are talking right now about your conclusion that
23 she would have, with 100 percent certainty according to your
24 report, gotten a promotion if she had stayed at AstraZeneca.
25 That was one of your conclusions; is that correct?

S. Severt - X

1 A Right. So you are asking me did I review that job that I
2 said she might have gotten promoted to?

3 Q Well, did you do any independent research to determine
4 whether she was qualified for the promotion that she told you
5 she was going to get?

6 A I did not.

7 Q And did you do any independent research to confirm that
8 the annual salary increase of \$50,000 to \$60,000 a year was
9 correct?

10 A I did not do any independent research.

11 Q So you didn't do any research to determine if such a
12 position was open at AstraZeneca in 2020?

13 A I did not.

14 Q And you didn't research how often positions such as that
15 became available at AstraZeneca?

16 A I did not.

17 Q And you didn't do any research on how many of those
18 positions actually exist at AstraZeneca?

19 A That is correct. I did not.

20 Q And you didn't do anything to confirm that those positions
21 were promotions rather than lateral positions?

22 A I would not be able to -- I wouldn't know that.

23 Q And you don't know anything about how many people
24 typically apply for those positions at AstraZeneca?

25 A No.

S. Severt - X

1 Q And you don't know anything about the selection process at
2 AstraZeneca for one of those promotions?

3 A I do not.

4 Q And do you have any evidence that Ms. Ivie would have been
5 able to remain living in Utah if she was selected for one of
6 those positions?

7 A I do not know if she would have been able to stay in Utah.

8 Q You talked a little bit about the jobs that Ms. Ivie did
9 apply for. Is it your understanding that 85 percent of the
10 jobs she applied for were at the executive district sales level
11 or higher?

12 A According to her rough estimates, yes. From the date of
13 termination to February of 2020, she estimated that 85 percent
14 of the jobs were at her prior level or higher.

15 Q And so you understood that Ms. Ivie was applying for some
16 jobs -- some percentage of that -- 85 percent -- were at a
17 higher level than the position she had at AstraZeneca?

18 A Yes.

19 Q And what did you do to verify that Ms. Ivie was qualified
20 for these higher-level positions she was applying for?

21 A I did not verify. I presumed that she knew which jobs she
22 qualified for based on her knowledge of the job.

23 Q Okay. You just relied on what Ms. Ivie told you in your
24 one-on-one interview with her?

25 A Yes. Ms. Ivie is an expert in her job field -- in her

S. Severt - X

1 field.

2 MS. TALCOTT: Objection, Your Honor.

3 THE COURT: Overruled.

4 BY MS. TALCOTT:

5 Q Mr. Severt, you used information from the Economic
6 Research Institute to obtain salaries for comparable jobs for
7 Ms. Ivie in order to determine what her wage loss was; is that
8 correct?

9 A That's correct.

10 Q And you concluded that Ms. Ivie would not be able to earn
11 as much at a new job as she did when she worked for
12 AstraZeneca; is that correct?

13 A That's correct.

14 Q And you looked at salaries across all industries for
15 district sales managers with four years of experience; is that
16 correct?

17 A That's correct.

18 Q And you looked at salaries across all industries for
19 regional sales managers with five years of experience; is that
20 correct?

21 A That's correct.

22 Q Ms. Ivie had a 27-year career in the pharmaceutical
23 industry, correct?

24 A Yes.

25 Q And she had 19 years of experience as a district sales

S. Severt - X

1 manager at AstraZeneca; is that correct?

2 A That, I don't know. She started with AstraZeneca in 2001,
3 and she was promoted in 2013. So she had 13 years of
4 experience as a district sales manager. The reason why I
5 reduced her years of experience for the wage estimate was
6 because I assumed she would be working in a different industry
7 and that they wouldn't compensate her at the same level had she
8 been in that other industry.

9 Q So that assumption meant that you used a lower salary for
10 someone with a sales manager position in a different industry
11 as compared to if you had given Ms. Ivie credit for her full
12 years of experience; is that correct?

13 A Correct.

14 Q Would you agree with me, Mr. Severt, that sales skills are
15 fairly transferable?

16 A Yes, I agree with that.

17 Q And were you aware of any changes in Ms. Ivie's skills or
18 experience that would have supported your conclusion that she
19 should not get credit for her 27 years in sales in the
20 pharmaceutical industry?

21 A No. Her skills haven't diminished, but what has
22 diminished is the longer you are out of work, the harder it is
23 to get a new job. That's what has been diminished.

24 Q Well, you used a salary table that only gave her credit
25 for four of her 27 years of experience; is that correct?

S. Severt - X

1 A I looked at -- she was a district sales manager with
2 AstraZeneca for 13 years, and I reduced that to five in the one
3 case and four years in the other case, because I assumed that a
4 new industry would not hire her at a premium wage, because she
5 would have to learn an entirely new industry. Yes, sales is
6 transferable, but different industries have different --
7 they're just different.

8 Q You made that conclusion?

9 A Yes.

10 Q Did you base that reduction on any formula or was that
11 something that you --

12 A Just based on my experience.

13 Q Did you use 2019 employment numbers when you concluded
14 that Ms. Ivie would be out of work for 18 months?

15 A I don't know that I used any specific employment numbers,
16 but I did read your economist's report who referenced it.

17 Q So when you concluded that Ms. Ivie would be reasonably
18 out of work for 18 months, that was just something that you
19 concluded on your own without reference to any statistics?

20 A So I was referred the file in November of 2019. So she
21 had been terminated in July of 2019. I estimated that she
22 would get a job, if, as you said, in the 18 month -- the 18
23 months, is that from the day of termination, or is that the
24 date from when I first interviewed her?

25 Q That's your report, Mr. Severt.

S. Severt - X

1 A Then it would have been from the date she was terminated.
2 I estimated, based on -- when a person gets terminated from a
3 job under the circumstances that Ms. Ivie was terminated, she
4 has to learn how to explain herself to the world of work, and
5 so that is why it requires more time.

6 Additionally, yes, there are statistics on how long
7 it should take a person who has been laid off or terminated to
8 get a new job. But this is -- this is an innuendo of one. This
9 is a unique situation. She is a whistleblower. Those
10 statistics, you can throw them out the window.

11 Q So the answer is, no, you did not use statistics in
12 concluding that Ms. Ivie would be out of work for 18 months?

13 A I didn't use the statistics that you are referencing and
14 that your economist used.

15 Q Okay. So these are the statistics that, according to the
16 U.S. Bureau of Labor, the average length of time someone would
17 be unemployed in Utah in 2019 was 13 weeks?

18 A Yes. I remember that.

19 Q The median length of time that individuals were unemployed
20 in Utah in 2019 was less than five weeks. Were you aware of
21 that?

22 A Yes. My answer to that is she is not a cashier. She is a
23 C-level executive.

24 Q Mr. Severt, you testified a moment ago that Ms. Ivie is
25 unique because she is a whistleblower, but you are also

S. Severt - X

1 testifying based on other experience you have with
2 whistleblowers; is that correct?

3 A I have worked with other whistleblower cases, yes.

4 Q So some of those whistleblowers are also included
5 presumably in that U.S. Labor of Bureau statistic, correct?

6 A It is possible. Again, I don't know what percentage they
7 make up of that data. And when I refer to Ms. Ivie being
8 "unique," I was referencing that classification of
9 whistleblower.

10 Q What is your understanding of how many employers Ms. Ivie
11 told that she was a whistleblower?

12 A I don't believe that she told any of them she was a
13 whistleblower, but I know it is on the Internet. That's what
14 her complaint states. It states --

15 Q You mean her legal complaint?

16 A Her legal complaint, she is filing under a whistleblower
17 statute, as well as a number of things.

18 Q So you are basing your conclusion -- just to make sure I'm
19 clear -- that employers know she is a whistleblower because she
20 filed this lawsuit?

21 A Some do know. And I presume that those who told her that
22 they were going to give her another interview and didn't
23 somehow found out. I don't know.

24 Q But you've not been told that by anyone?

25 A No.

S. Severt - ReD

1 Q That's your assumption; is that correct?

2 A Yeah. Again, it's public information. Her case is public
3 information.

4 MS. TALCOTT: No further questions.

5 THE COURT: Thank you, Ms. Talcott.

6 Redirect.

7 MS. CHAMBERS: Yes. Just a few.

8 REDIRECT EXAMINATION

9 BY MS. CHAMBERS:

10 Q I wanted to go over again: How many jobs did Ms. Ivie
11 apply for?

12 A The first, from termination until February of 2020, at
13 least 112; then subsequent to that, until she was hired,
14 another 37. So it is 149 -- at least 149.

15 Q Okay. And in your opinion, as a vocational expert, did
16 she conduct a sufficient job search?

17 A Yes. She had 40 interviews, 10 of which were from
18 headhunters. That counts only the initial interviews. It does
19 count not the follow-up interviews.

20 Q Did she submit to you documentation from her job search
21 and job interviews?

22 A Yes.

23 Q And you reviewed that information?

24 A Yes.

25 Q Ms. Talcott asked you about how you knew that she was a

S. Severt - ReD

1 whistleblower and how her employers would learn about it. I
2 just want to make sure I'm clear on it. So is it true that
3 Ms. Ivie would get some interviews and then just not hear
4 back --

5 A Yes.

6 Q -- from employers?

7 And the legal complaint you're referring to is
8 Ms. Ivie's complaint, which states she was terminated from
9 AstraZeneca and alleges whistleblowing allegations, right?

10 A Yes.

11 Q And you said that's publicly available online. So if
12 someone Googles Suzanne Ivie's name, that complaint will come
13 up?

14 A Yes.

15 Q So based on your expert opinion, it's possible that some
16 employers looked up Suzanne's name and saw that complaint?

17 A It is possible.

18 Q Okay. Why might employers not want to hire someone who
19 has filed a complaint like that?

20 A Because of the reasons that I stated. Future employers
21 view whistleblowers as troublemakers, untrustworthy, and
22 suspicious.

23 MS. CHAMBERS: No further questions.

24 THE COURT: Thank you.

25

S. Severt - ReX

1 RE CROSS-EXAMINATION

2 BY MS. TALCOTT:

3 Q Mr. Severt, did any of the documents that you received
4 from Ms. Ivie concerning her job search refer to her being a
5 whistleblower?

6 A No.

7 MS. TALCOTT: Thank you.

8 THE COURT: May this witness be excused?

9 MS. CHAMBERS: Yes.

10 THE COURT: Thank you, sir.

11 Who is your next witness, Ms. Chambers?

12 MS. CHAMBERS: It would be Dr. Edelman. I would like
13 to maybe talk about the schedule a bit.

14 THE COURT: Okay.

15 All right. Members of the jury, we will take our
16 evening recess. A reminder again, as you are leaving, please
17 do not discuss this case with one another or with anybody else.
18 Tomorrow morning, I have a 9:00 a.m. criminal matter that I was
19 unable to reschedule. I apologize. So we will start tomorrow
20 at 9:30 a.m. Thank you very much.

21 (Open court; jury not present:)

22 THE COURT: I just want to put this on the record:

23 We received a note from, I believe, Juror No. 6. It says, "I
24 think Exhibit 129 still has Ms. Ivie's DOB at the top of the
25 page." Exhibit 129 was, of course, Dr. Johnson's medical

1 records. I'm not, frankly, clear why --

2 MS. RIECHERT: Probably the HIPAA violation.

3 THE COURT: Anyway, that's on the record.

4 9:30. My apologies. I have a criminal matter. I
5 cannot reschedule. We lost half an hour with a 9:30 start
6 time.

7 I noticed that Mr. Hinson is scheduled tomorrow
8 morning for 30 minutes and then Mr. Edelman 45 minutes,
9 according to your witness statement.

10 MS. RIECHERT: Those are only the direct
11 examinations, Your Honor.

12 THE COURT: Right.

13 MS. RIECHERT: My problem is this: I've got
14 squeezed, because I have all my witnesses showing up. I have
15 one day, and they are all here. It is just not fair that I
16 don't get to put them on because they went way over their
17 schedule.

18 THE COURT: Starting at 9:30, will your witnesses,
19 your best guess, fill the day?

20 MS. RIECHERT: I'm not sure. I counted the minutes
21 yesterday. We've got to pull one of the witnesses. I will do
22 my math tonight. I have my running schedule here.

23 THE COURT: Okay.

24 MS. RIECHERT: I don't know if I can put my witnesses
25 on first before Mr. Hinson and Mr. Edelman to be sure we get

1 them done. I'll have to get them done.

2 MR. OSWALD: Your Honor, we are fine with that.

3 THE COURT: I guess if push comes to shove, we will
4 put on a witness Monday morning, and then we will go right to
5 closing, instructions, and deliberations and still get the case
6 to the jury Monday would be my sincere hope. So I don't have
7 to go back to them again.

8 All right. Thank you, Ms. Riechert. Take a look at
9 your folks that are on for tomorrow. See how much wiggle room
10 you have. Then it sounds like plaintiff is going to be
11 flexible and let you folks go however long you need tomorrow --

12 MS. RIECHERT: Thank you.

13 THE COURT: -- and try to squeeze in Hinson or
14 Edelman if we can.

15 MR. OSWALD: Thank you, Your Honor.

16 THE COURT: We will try to work together.

17 Court is in recess.

18 (Recess.)

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I certify, by signing below, that the foregoing is a correct transcript of the record of proceedings in the above-entitled cause. A transcript without an original signature, conformed signature, or digitally signed signature is not certified.

/s/ Dennis W. Apodaca
DENNIS W. APODACA, RDR, RMR, FCRR, CRR
Official Court Reporter

September 7, 2021
DATE

<p>"ANSWER: [2] 612/22 662/7 "QUESTION: [1] 661/24 BY MR. McCARTHY: [4] 643/1 695/14 697/15 728/17 BY MR. OSWALD: [10] 619/5 628/20 629/2 630/8 632/13 632/23 633/17 638/18 641/24 642/3 BY MS. CHAMBERS: [20] 538/4 563/4 588/21 600/3 691/20 699/1 713/1 716/11 718/12 719/20 721/18 723/4 724/25 727/15 727/22 730/1 733/4 734/21 735/14 752/8 BY MS. RIECHERT: [5] 602/1 649/21 678/21 702/15 717/1 BY MS. TALCOTT: [3] 740/8 747/3 754/1 MR. McCARTHY: [45] 511/9 511/24 512/5 514/4 514/11 520/2 522/3 523/3 523/6 527/20 529/6 530/13 531/23 532/12 535/20 536/6 536/16 628/18 628/25 630/6 632/11 632/17 633/15 638/13 641/20 641/22 642/19 645/22 646/22 690/25 695/11 698/2 702/6 702/9 716/4 716/6 719/17 721/13 721/15 722/10 724/23 727/5 727/20 728/10 729/5 MR. OSWALD: [36] 509/7 509/9 525/14 528/10 528/17 529/19 531/1 532/14 533/1 533/3 533/14 533/23 533/25 534/2 536/7 536/25 537/6 537/18 618/19 641/14 642/2 642/15 645/24 646/1 646/9 646/18 647/10 647/14 647/17 647/21 648/2 698/7 698/9 717/25 756/1 756/14 MS. CHAMBERS: [34] 517/20 517/22 521/13 537/19 588/20 599/20 601/22 690/22 691/5 691/7 695/10 702/4 702/8 702/11 712/22 716/20 717/22 721/14 722/7 722/13 722/16 727/9 727/12 728/12 729/7 729/12 732/23 734/13 735/5 740/4 752/6 753/22 754/8 754/11 MS. RIECHERT: [16] 563/2 599/19 599/22 617/10 647/25 648/19 690/9 712/20 716/22 717/19 755/1 755/9 755/12 755/19 755/23 756/11 MS. TALCOTT: [8] 537/3 733/2 734/11 734/14 735/3 747/1 752/3 754/6 THE CLERK: [13] 536/14 537/24 618/21 618/25 690/15 691/11 691/15 691/18 698/22 718/8 722/22 729/18 729/21 THE COURT REPORTER: [1] 678/18 THE COURT: [128] 509/3 509/8 511/6 511/23 512/4 514/3 514/10 517/16 517/21 519/25 521/12 522/18 523/4 525/13 527/19 528/9 528/15 532/5 532/13 532/23 533/2 533/5 533/8 533/20 533/24 534/1 536/5 536/20 537/2 537/8 537/10 537/20 537/22 538/2 563/3 588/10 588/19 599/24 600/1 601/23 617/12 618/1 618/20 628/19 629/1 630/7 632/18 633/16 638/15 641/19 641/21 641/23 642/17 645/23 645/25 646/7 646/11 647/1 647/8 647/13 647/16 647/18 649/11 649/17 690/7 690/10 690/16 690/24 691/3 691/6 691/8 697/6 697/10 697/14 698/5 698/8 698/10 698/13 698/16 698/20 702/7 702/10 712/21 716/5 716/21 717/20 717/24 718/1 719/18 721/17 722/8 722/12 722/14 722/17 722/19 723/1 724/24 727/8 727/11 727/14 727/21 728/11 728/15 729/6 729/8 729/11 729/13 733/1 733/3 734/12 734/16 734/20 735/7 740/6 747/2 752/4 753/23 754/7 754/9 754/13 754/21 755/2 755/11 755/17 755/22 756/2 756/12 756/15 THE WITNESS: [25] 537/21 538/1 599/25 600/2 619/2 632/19 638/16 642/21 647/7 678/20 690/23 691/17 697/9 697/12 698/3 698/12 698/24 718/10 722/18 722/24 723/2 729/10 729/20 734/18 735/8</p>	<p>'It [1] 580/15 'nice [1] 580/16 'old [2] 548/25 565/1 'out [1] 688/25 'Thanks [2] 560/15 560/16</p>
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	/s [1] 757/8
	1
	1-29 [1] 695/5 10 [4] 534/6 588/16 674/1 752/17 100 [9] 534/20 561/10 561/12 587/9 587/11 595/17 652/25 742/12 743/21 100 percent [3] 715/1 743/23 744/23 1000 [1] 507/22 101 [1] 534/20 102 [1] 534/21 103 [2] 528/25 534/21 104 [1] 534/22 105 [2] 528/25 534/22 106 [1] 534/23 106th [1] 653/2 107 [3] 528/25 534/23 561/9 108 [2] 534/24 561/9 10th [7] 547/12 551/6 625/17 626/3 640/19 669/10 670/1 11 [2] 528/24 534/6 11-ish [1] 674/1 110 [1] 534/24 111 [1] 534/24 1110 [1] 507/4 112 [3] 534/24 737/12 752/13 113 [1] 534/24 114 [1] 534/24 115 [1] 534/25 116 [1] 534/25 117 [1] 534/25 118 [1] 534/25 119 [1] 534/25 11:00 sharp [1] 588/16 11th [1] 733/15 12 [3] 534/8 692/20 699/12 120 [1] 534/25 121 [1] 534/25 1211 [1] 507/12 122 [1] 534/25 123 [2] 534/25 665/1 125 [2] 534/25 545/24 126 [1] 534/25 127 [2] 528/25 534/25 128 [11] 525/15 528/17 528/20 531/16 531/20 532/9 532/20 535/1 535/1 536/4 653/2 129 [7] 535/2 692/10 695/3 695/6 695/20 754/24 754/25 12th [3] 547/12 551/6 703/23 12th meeting [1] 669/10 13 [9] 534/8 610/22 649/7 674/1 699/12 732/7 748/3 749/2 750/17 13 percent [1] 653/8 130 [1] 535/2 131 [1] 535/2 132 [1] 535/2 133 [2] 528/25 535/2 134 [1] 535/2 135 [1] 535/2 136 [1] 535/2 137 [1] 535/2 138 [1] 535/2 139 [1] 535/2 14 [4] 534/8 674/1 696/25 699/12 140 [2] 535/2 675/19

1	2
1400 [1] 507/7	2-18-19 [1] 675/14
141 [1] 535/3	20 [31] 513/2 516/17 519/8 519/9 519/12 520/13 528/24 534/8 559/10 559/19 579/9 579/19 579/21 587/7 613/13 614/17 614/24 615/9 625/7 626/25 629/7 649/4 655/12 655/16 655/23 656/4 676/1 715/4 715/7 715/12 717/3
142 [1] 535/3	20 percent [3] 612/25 629/9 650/25
143 [3] 535/3 703/22 703/22	20006 [1] 507/4
144 [1] 535/3	2001 [1] 748/2
147 [1] 535/6	2005 [1] 619/17
149 [3] 737/9 752/14 752/14	201 [1] 536/11
14th [1] 594/22	2010 [1] 515/25
15 [4] 534/8 648/8 730/10 737/13	2012 [2] 717/16 717/18
15 percent [1] 737/13	2013 [1] 748/3
15-minute [1] 588/15	2014 [1] 515/25
150 [18] 535/6 586/7 587/5 611/24 612/2 612/6 613/16 613/25 614/2 617/5 675/19 675/22 681/18 685/20 685/24 686/4 686/10 714/22	2016 [1] 515/25
151 [1] 535/7	2017 [9] 515/25 611/20 652/1 675/22 676/7 699/9 699/9 700/5 717/3
152 [1] 535/8	2018 [78] 539/8 545/25 546/4 546/7 547/10 547/11 547/12 554/19 558/7 561/4 561/6 562/2 562/9 580/6 581/5 581/8 594/22 602/20 602/22 603/25 606/9 607/21 610/19 611/7 611/22 611/22 612/1 614/15 615/9 615/12 615/12 615/20 616/9 616/15 617/4 630/3 630/6 650/9 651/10 652/9 652/23 653/3 656/9 657/19 658/1 659/13 659/13 660/5 663/5 663/8 663/23 664/4 664/4 664/5 664/18 668/14 668/15 668/19 671/3 671/13 673/25 674/24 676/3 676/3 676/17 700/15 701/3 702/1 703/18 705/4 705/7 706/2 706/12 711/7 711/15 712/9 713/4 715/18
153 [1] 535/9	2019 [75] 518/19 547/23 558/6 558/11 558/23 568/24 569/19 570/14 570/21 571/10 576/19 577/1 577/1 585/21 588/25 589/2 589/3 589/10 589/19 591/16 591/17 592/12 596/22 596/23 606/22 606/25 610/22 624/12 624/14 625/17 626/4 629/5 629/14 629/21 635/5 636/23 640/19 643/22 674/11 675/6 680/10 680/12 681/4 681/7 683/17 683/22 684/15 684/23 688/19 692/16 692/23 694/25 695/21 696/6 701/3 702/1 703/23 706/8 706/15 712/9 719/7 719/10 720/6 720/8 721/4 725/10 726/11 727/24 727/25 733/12 749/13 749/20 749/21 750/17 750/20
154 [1] 535/9	2020 [9] 733/13 733/14 737/11 737/15 739/9 742/19 745/12 746/13 752/12
155 [1] 535/9	2021 [6] 506/5 509/1 733/14 739/10 739/11 757/8
156 [1] 535/10	2022 [1] 743/18
157 [1] 535/10	21 [7] 534/9 661/24 662/3 662/3 662/5 676/17 732/6
158 [1] 535/10	22 [3] 534/9 649/3 730/6
159 [1] 535/11	23 [2] 534/9 676/19
15th [7] 568/24 569/19 570/14 674/13 674/17 674/19 732/1	239 [1] 606/3
15th of [2] 568/5 568/6	24 [2] 534/9 692/20
15th with [1] 573/2	24th [2] 539/7 546/3
16 [4] 534/8 606/20 608/4 730/10	25 [5] 534/9 661/24 662/3 662/3 662/5
160 [8] 535/11 586/8 587/5 681/18 685/20 686/4 686/10 714/22	25 percent [1] 737/17
161 [3] 661/23 662/3 662/5	25th [1] 571/10
162 [1] 535/11	25th of [1] 530/3
163 [1] 535/11	26 [1] 534/9
164 [1] 535/11	27 [6] 534/9 692/1 732/1 736/10 748/19 748/25
165 [1] 535/12	27-year [1] 747/22
166 [1] 535/12	27th [1] 581/5
167 [1] 535/12	28 [1] 534/9
168 [1] 535/13	29 [4] 534/9 570/12 674/12 695/5
169 [1] 535/13	2:42 Mountain [1] 554/19
16th [2] 585/22 591/17	2s [2] 734/1 742/3
17 [4] 506/5 509/1 534/8 611/20	
17 percent [1] 653/5	
17-and-a-half-week [1] 739/4	
170 [1] 535/13	
1701 [1] 507/10	
171 [1] 535/13	
1717 [1] 507/4	
172 [1] 535/14	
173 [1] 535/14	
174 [1] 535/15	
175 [1] 535/15	
176 [1] 535/16	
177 [3] 535/16 581/1 649/23	
178 [1] 535/16	
179 [1] 535/17	
17th [6] 554/19 555/3 555/14 569/21 571/21 573/6	
17th of [1] 526/22	
18 [7] 534/8 731/6 749/14 749/18 749/22 749/22 750/12	
180 [1] 535/18	
18th [16] 555/16 562/8 564/11 565/18 565/25 566/4 618/7 618/13 651/10 651/17 651/19 671/13 680/12 681/6 682/13 692/16	
18th of [1] 680/10	
18th was [1] 651/21	
19 [15] 521/16 534/8 538/8 538/9 565/19 583/6 583/9 623/23 624/10 675/14 705/24 715/4 715/11 736/11 747/25	
19-year [3] 518/16 522/2 717/6	
1900 [1] 507/12	
19103 [1] 507/10	
19th [5] 630/3 651/18 651/21 671/13 682/13	
19th is [1] 672/11	
19th of [1] 671/3	
1st [4] 530/2 692/23 695/20 696/6	
	3
	3.6 [2] 670/10 670/14
	30 [3] 534/10 571/7 755/8
	30-some-odd [1] 718/24
	301 [1] 507/22
	31 [4] 534/10 545/23 545/25 660/3
	32 [1] 534/10
	324 [2] 554/15 554/18
	326-8182 [1] 507/23
	33 [1] 534/10
	34 [1] 534/10
	35 [3] 534/10 723/13 723/16

3	
36 [3] 528/24 534/10 660/20	691 [1] 508/6
37 [2] 737/16 752/14	695 [1] 508/6
38 [1] 534/11	699 [1] 508/7
39 [1] 534/11	6th [10] 596/23 597/22 626/4 636/23 637/8 637/25 638/7 638/12 638/20 643/22
3:00 [2] 648/15 649/9	
3:19-cv-01657-JR [1] 506/4	7
3:55 [1] 593/4	70 [3] 516/22 517/10 534/15
3rd [6] 589/2 589/9 589/19 589/24 591/16 688/19	70 percent [1] 737/12
	70-page [1] 668/12
4	702 [1] 508/5
40 [2] 534/11 752/17	703 [1] 735/6
401 [1] 522/22	71 [1] 534/15
402 [1] 641/16	713 [1] 508/4
403 [4] 519/19 519/20 522/23 529/17	717 [1] 508/4
404 [2] 518/14 727/8	718 [1] 508/8
42 [2] 534/12 649/4	72 [1] 534/16
43 [2] 534/12 651/5	723 [1] 508/9
44 [1] 534/12	728 [1] 508/9
45 [3] 534/12 535/4 755/8	73 [1] 534/16
46 [3] 534/12 535/5 591/15	730 [1] 508/10
47 [2] 534/12 651/6	737 [2] 608/8 608/8
48 [2] 534/12 579/6	74 [1] 534/16
48/52 [1] 559/16	740 [1] 508/10
49 [1] 534/12	75 [4] 534/16 564/2 672/20 672/20
4th [3] 611/22 612/1 704/6	752 [1] 508/10
	754 [1] 508/10
5	76 [1] 534/16
5.5 [1] 676/18	77 [1] 534/16
50 [2] 534/12 579/6	78 [1] 534/16
50 percent [9] 552/11 553/8 556/11 556/20 557/21 570/1 571/14 670/5 670/9	79 [1] 534/16
50/50 [1] 579/6	7th [5] 525/18 526/1 526/4 528/22 532/19
503 [1] 507/23	
504 [1] 615/20	8
507 [2] 651/2 651/3	80 [1] 534/16
508 [1] 657/24	80 percent [20] 518/25 519/2 613/6 613/9 614/5 614/7 614/12 614/20 615/6 617/8 629/7 654/5 655/3 655/9 656/14 671/25 680/2 681/9 684/13 684/16
51 [1] 534/12	80/20 [28] 513/2 516/17 519/8 519/9 519/12 520/13 559/10 559/19 579/9 579/19 579/21 587/7 613/13 614/17 614/24 615/9 625/7 626/25 629/7 655/12 655/16 655/23 656/4 676/1 715/4 715/7 715/12 717/3
52 [2] 534/12 559/16	803 [1] 641/19
520 [1] 614/16	81 [5] 534/16 575/12 635/8 684/20 684/22
522 [1] 611/14	8182 [1] 507/23
53 [2] 534/12 651/6	82 [1] 534/16
531 [3] 658/12 658/12 659/10	83 [1] 534/16
533 [2] 603/7 603/22	84 [1] 534/16
538 [1] 508/4	848 [1] 603/24
539 [1] 603/24	849 [1] 603/24
54 [1] 534/12	85 [2] 534/16 746/16
540 [1] 608/8	85 percent [2] 746/9 746/13
545 [2] 554/14 554/15	851 [1] 604/16
55 [1] 534/12	853 [2] 604/17 604/21
56 [1] 534/12	858 [1] 605/6
57 [1] 534/12	86 [1] 534/16
58 [3] 528/24 534/13 625/10	862 [1] 605/6
59 [3] 640/10 641/16 646/8	865 [1] 605/18
5th [8] 576/25 635/4 635/5 635/7 637/16 637/25 684/23 704/8	87 [2] 534/16 630/11
	871 [1] 564/20
6	88 [2] 528/24 534/17
6-19-17 [1] 611/20	89 [1] 534/18
60 [1] 534/14	8:15 [2] 509/4 537/14
602 [1] 508/4	8th [1] 611/22
61 [2] 534/14 594/21	
619/649 [1] 508/5	9
62 [3] 534/14 742/10 743/10	90 [1] 534/18
63 [1] 534/14	901 [1] 641/18
64 [2] 528/24 534/14	907 [1] 575/12
643/702 [1] 508/5	91 [3] 534/18 675/10 680/5
649 [1] 508/5	92 [2] 534/18 687/25
65 [1] 534/15	93 [1] 534/18
66 [1] 534/15	94 [2] 534/18 686/19
67 [4] 534/15 598/23 636/25 643/8	
68 [1] 534/15	
69 [2] 534/15 568/21	

9	adhere [1] 660/17
94304 [1] 507/7	adherence [2] 575/22 636/11
95 [1] 534/18	adjusted [1] 675/22
96 [1] 534/18	adjustments [1] 682/18
97 [3] 528/25 534/18 561/9	administrative [1] 629/10
97 percent [1] 562/4	admission [1] 512/1
97204 [2] 507/13 507/22	admit [2] 654/18 654/22
98 [3] 528/25 534/19 561/9	admitted [15] 519/2 524/23 525/19 526/8 527/1 532/23 533/10 533/19 534/5 535/23 536/11 536/13 646/19 676/7 703/12
99 [1] 534/20	advancement [1] 735/16
99.4 [1] 561/12	advantage [1] 659/22
9:00 [2] 509/6 537/13	adverse [1] 574/18
9:00 a.m [1] 754/18	adversely [1] 735/18
9:00 o'clock [1] 537/16	advisory [1] 509/24
9:30 [4] 754/20 755/4 755/5 755/18	affairs [2] 554/22 554/23
A	affect [1] 657/5
a.m [3] 537/13 754/18 754/20	affected [2] 729/1 735/17
Aaron [3] 551/16 604/8 608/11	affecting [3] 539/1 601/17 601/17
aback [5] 541/24 542/5 545/4 545/7 549/22	affects [1] 516/5
Abbonizio [7] 688/7 688/18 688/20 688/22 702/18 703/24 704/4	affirm [1] 522/20
ability [3] 564/24 658/22 680/18	affirmatively [1] 536/11
able [18] 554/24 554/25 565/8 565/11 566/17 586/20 586/23 587/21 592/14 631/3 728/4 734/7 736/14 736/21 745/22 746/5 746/7 747/10	afraid [1] 570/6
able to [1] 745/22	after [89] 509/14 511/8 519/14 519/17 521/1 527/4 538/16 541/11 541/16 542/18 542/20 545/2 546/9 551/8 552/12 553/4 553/6 553/7 553/10 553/22 554/7 555/21 556/4 556/12 556/21 557/18 557/22 558/2 559/7 560/22 563/6 566/4 566/20 567/4 569/7 569/20 569/21 572/16 572/20 572/22 573/5 573/13 573/23 585/16 585/16 585/25 588/16 591/4 591/14 592/5 592/13 593/24 598/3 599/16 600/19 602/22 606/20 607/10 607/14 607/15 607/18 608/3 608/4 610/4 611/1 611/4 611/5 631/7 668/19 670/1 670/5 670/10 672/7 672/14 673/12 673/16 674/8 675/1 680/7 680/10 701/8 707/9 721/4 721/4 724/13 726/10 726/23 734/25 737/8
about [357]	afternoon [22] 618/1 618/3 638/4 643/3 647/5 647/6 647/14 648/6 648/9 648/16 648/18 666/1 691/22 695/16 698/12 699/3 718/14 723/6 728/19 730/3 740/10 740/11
above [10] 563/18 592/7 637/10 638/1 665/3 682/22 682/24 694/13 735/2 757/5	afterwards [1] 551/7
above-entitled [1] 757/5	again [70] 512/6 514/20 516/16 517/10 517/13 519/18 520/11 520/21 521/11 521/14 522/5 524/20 525/8 529/7 529/16 535/25 536/10 541/18 543/3 543/3 545/7 555/4 557/15 558/22 559/7 563/18 571/2 573/8 578/8 578/10 582/8 583/20 584/5 584/14 590/15 593/21 594/9 597/25 599/17 606/6 614/19 617/5 621/15 634/21 635/5 638/17 648/17 648/20 672/5 681/15 689/19 693/24 695/2 726/4 727/20 734/2 734/9 736/3 736/16 736/17 737/5 737/24 738/6 738/20 738/21 751/6 752/2 752/10 754/16 756/7
absence [3] 682/5 686/16 707/6	against [17] 564/25 601/16 602/8 609/20 610/2 610/6 610/10 625/2 626/15 634/2 634/23 639/16 639/19 644/7 685/18 686/8 703/19
absolutely [17] 555/21 561/25 562/11 562/17 583/20 620/8 620/10 622/8 622/13 627/8 632/21 632/22 634/15 634/20 636/19 644/12 652/6	age [23] 514/25 516/23 518/3 549/4 549/6 549/7 549/11 549/13 589/21 602/4 602/8 606/11 606/15 607/20 609/21 610/2 610/6 610/10 634/3 682/3 723/12 742/10 743/10
academy [5] 682/10 683/7 683/18 684/2 684/5	aging [1] 549/23
accept [7] 585/1 598/11 598/15 598/17 598/19 599/7 642/8	ago [8] 626/16 643/12 643/16 643/23 675/25 696/4 723/13 750/24
acceptable [1] 735/11	agree [21] 531/10 536/8 614/11 615/22 621/13 621/18 621/23 622/18 646/22 652/11 653/10 659/25 683/3 684/2 684/6 697/24 705/22 706/1 741/6 748/14 748/16
accepted [2] 536/12 635/3	agreed [6] 510/6 510/25 647/23 648/10 648/24 649/8
accepting [2] 599/3 637/10	agreement [1] 535/24
access [8] 586/20 586/23 586/24 587/3 592/17 596/3 667/25 687/13	Ah [1] 544/4
accessing [2] 687/12 687/16	ahead [3] 632/19 649/12 702/13
according [7] 673/4 688/20 689/9 744/23 746/12 750/15 755/9	air [1] 657/14
account [3] 614/20 676/21 743/9	aligned [2] 658/8 660/14
accurate [7] 596/11 627/1 639/20 689/13 692/8 695/3 695/8	all [155] 509/17 510/3 513/8 517/24 518/8 518/23 519/18 519/19 520/18 521/9 522/24 525/1 525/18 526/3 526/20 527/2 527/5 530/1 530/8 530/24 537/12 537/13 539/3 539/5 540/6 544/7 544/23 545/18 545/22 546/21 550/18 550/20 551/2 551/4 552/3 554/2 554/23 555/22 556/6 557/8 557/14 558/7 558/15 559/2 559/12 560/22 561/3 562/8 562/9 563/17 564/2 566/20 566/22 567/16 567/20 568/19 569/6 569/17 569/19 571/5 571/9 575/1 578/1 578/16 578/22 580/1 580/23 582/8 585/6 586/5 586/18 586/20 589/25 592/6 592/11 592/18 592/24 593/1 593/2
accuse [1] 583/9	
accused [2] 515/14 565/22	
across [5] 619/20 709/14 714/23 747/14 747/18	
act [5] 576/2 576/3 576/3 576/5 576/7	
Act Right [1] 576/2	
acted [2] 639/2 639/3	
acting [2] 608/13 705/3	
action [2] 562/12 688/23	
actively [1] 680/25	
activities [7] 577/12 577/20 578/12 580/20 580/21 588/9 660/18	
activity [3] 577/13 578/6 578/20	
actual [9] 519/22 582/17 608/23 609/10 621/1 634/17 686/19 704/11 721/8	
actually [19] 511/11 516/11 537/14 560/4 563/20 576/17 587/2 591/14 605/12 610/15 619/14 634/7 651/18 690/16 690/22 709/18 720/11 721/12 745/18	
acumen [1] 629/13	
add [3] 664/8 664/11 672/19	
added [2] 650/11 664/12	
addendum [2] 739/10 739/11	
addition [4] 532/14 686/24 704/6 733/23	
additional [10] 511/17 526/6 526/16 543/24 574/20 639/3 645/18 650/11 689/12 704/5	
Additionally [1] 750/6	
address [5] 511/15 556/3 606/21 610/24 610/25	
addressed [2] 606/23 627/5	
addressing [2] 697/5 697/14	
ADEA [2] 509/19 510/1	

A	
all... [76] 593/5 593/11 593/13 594/21 595/8 595/20 598/16 598/25 599/14 601/11 602/16 603/20 606/7 607/3 617/4 618/8 622/3 624/8 625/9 625/14 626/1 626/19 628/15 628/16 629/19 629/22 631/21 633/5 635/16 637/1 637/6 639/18 639/21 645/14 655/14 663/1 667/3 668/6 672/24 672/25 673/1 675/14 680/5 681/20 684/20 686/1 687/5 689/17 689/19 695/2 699/24 700/12 701/21 710/4 710/21 712/5 713/23 718/21 719/15 720/12 720/18 724/4 724/4 724/7 725/10 726/18 728/5 737/8 739/16 744/14 747/14 747/18 754/15 755/14 755/15 756/8	580/13 585/16 585/16 601/1 605/7 608/7 610/16 620/4 626/17 627/11 631/5 680/17 684/22 684/24 707/10 709/9 715/22 715/23 715/23 724/21 738/14 738/14 738/15 739/10 751/22 752/14 754/17
allegation [6] 514/20 632/6 632/20 633/25 634/4 635/22	answer [19] 512/21 555/9 628/10 632/19 633/10 633/12 638/16 645/19 677/22 678/19 697/8 697/11 716/9 721/16 734/17 740/21 740/22 750/11 750/22
allegations [4] 515/17 627/3 635/12 753/9	answered [5] 628/19 630/7 632/18 638/15 661/16
allege [1] 515/17	anticipate [1] 743/19
alleged [3] 514/22 514/25 515/2	anticipating [1] 567/21
alleges [2] 688/24 753/9	anticipation [1] 735/13
allocation [1] 611/19	anxiety [28] 567/9 574/13 574/19 574/25 575/10 575/20 576/6 585/17 587/20 600/14 636/9 685/10 685/11 693/7 693/11 693/22 694/2 696/5 696/17 696/23 697/21 697/25 705/6 706/10 706/17 706/25 707/1 707/4
allow [3] 509/24 510/8 646/13	anxious [2] 554/9 636/2
allowed [3] 530/20 650/14 731/7	any [91] 520/4 520/5 524/15 524/16 525/11 526/13 530/17 531/8 531/13 549/21 554/11 555/23 582/21 582/25 583/6 583/7 583/9 583/15 585/23 586/15 587/20 591/5 591/5 591/11 594/14 598/21 599/9 599/11 605/11 621/14 621/25 622/6 622/16 622/16 624/5 632/20 636/17 641/20 644/14 644/18 646/15 646/18 660/6 662/11 662/14 662/15 662/23 665/9 665/18 678/15 686/9 687/15 689/1 689/10 698/7 706/20 707/4 712/6 716/22 717/11 728/13 728/25 729/1 730/24 731/3 731/21 732/21 733/23 736/23 739/5 739/12 740/17 740/24 742/1 742/4 742/14 742/14 744/11 744/17 745/3 745/7 745/10 745/11 745/17 746/4 748/17 749/10 749/15 749/19 751/12 754/3
almost [5] 516/22 516/22 517/10 675/1 726/20	anybody [4] 592/1 607/14 717/11 754/17
along [7] 514/7 523/1 567/20 617/19 639/25 689/15 697/1	anymore [2] 546/20 601/19
already [12] 518/9 521/22 525/20 526/5 526/9 529/1 607/20 618/9 645/14 648/12 655/1 664/9	anyone [12] 539/24 544/18 551/15 585/24 586/15 587/11 594/8 594/13 598/2 715/7 715/10 751/24
also [68] 513/10 514/22 515/8 515/14 515/17 516/18 519/13 521/6 523/2 523/22 523/23 523/25 524/10 524/20 525/9 529/18 543/22 547/22 551/16 554/25 555/9 563/21 564/3 568/15 568/22 570/1 572/25 575/13 581/1 590/6 596/1 596/16 598/24 600/9 609/6 610/5 610/9 612/5 628/1 632/23 634/10 635/1 641/18 654/22 658/13 658/17 659/3 666/3 686/11 692/12 694/6 708/17 709/16 713/17 715/15 715/17 730/21 731/9 731/12 732/10 733/14 735/22 737/7 741/23 743/9 743/11 750/25 751/4	anything [47] 523/2 532/14 546/9 546/10 548/24 552/16 554/4 554/11 555/20 559/1 559/4 562/4 566/25 571/1 571/13 576/11 576/14 576/15 579/3 586/5 586/25 589/15 589/19 590/18 591/2 591/4 591/13 598/2 632/3 632/21 664/20 666/18 673/3 673/13 682/22 694/15 694/19 698/13 701/10 701/16 712/7 726/11 726/12 742/13 745/20 745/23 746/1
alter [2] 731/21 732/21	Anyway [1] 755/3
alternatives [1] 556/24	apart [1] 627/11
although [3] 529/10 532/8 532/9	Apodaca [3] 507/21 757/8 757/9
Alto [1] 507/7	apologies [5] 533/9 537/12 537/15 727/21 755/4
always [31] 531/25 532/6 538/14 538/16 538/19 560/13 595/2 627/13 627/23 629/7 667/24 699/21 701/8 701/9 719/25 720/3 720/4 721/1 721/1 722/1 722/7 723/19 724/5 724/8 724/12 724/13 724/14 724/18 724/19 726/22 728/9	apologize [4] 517/22 593/9 741/15 754/19
am [45] 527/1 532/8 544/1 550/18 556/7 560/10 563/12 566/22 570/3 570/5 578/25 580/14 584/3 584/6 584/19 584/20 584/23 584/24 590/15 590/23 595/16 595/19 597/22 600/23 618/11 631/12 643/3 647/2 662/2 685/3 687/23 689/18 697/5 704/18 712/1 716/13 718/16 718/24 723/8 723/12 728/19 730/5 731/8 731/10 731/12	app [2] 586/25 687/20
Amarin [1] 735/1	Apparently [1] 736/19
amazing [8] 538/13 561/7 719/13 723/25 724/1 724/5 724/5 724/6	appeal [9] 687/23 688/4 688/10 688/15 688/22 702/17 702/19 704/8 704/20
ambassador [3] 682/11 683/13 683/23	appealed [1] 687/25
ambiguity [1] 646/21	appear [3] 618/17 625/12 703/6
America [3] 619/13 711/11 711/13	appearance [6] 624/17 624/21 626/10 627/9 630/2 630/4
American [1] 731/9	APPEARANCES [1] 507/1
among [2] 523/17 624/15	appearing [1] 643/4
amount [1] 509/12	application [1] 707/13
Amy [10] 624/15 624/20 624/25 625/19 637/15 645/3 645/3 645/13 645/17 645/19	applications [2] 707/15 737/16
Amy Welch [2] 624/15 645/3	applied [13] 515/11 516/4 659/22 681/20 686/5 733/10 737/9 737/11 740/17 740/25 744/16 744/21 746/10
analysis [1] 735/21	apply [6] 525/4 681/23 734/14 745/24 746/9 752/11
analytics [2] 558/16 586/17	applying [3] 666/14 746/15 746/20
and Ms. Broussard [1] 711/15	appointed [1] 546/18
and/or [1] 641/6	apposed [1] 709/13
Andrew [2] 594/3 686/22	appreciate [10] 511/9 533/15 537/15 640/22 647/5 698/11 702/11 704/21 704/22 729/9
anger [2] 576/20 584/15	appreciated [1] 618/17
angry [1] 565/16	appreciates [1] 659/23
Anita [1] 507/2	approach [4] 556/25 557/2 557/2 647/11
Anne [1] 507/11	approaches [1] 516/15
announce [1] 710/6	appropriate [16] 510/7 520/19 529/8 532/9 533/22 536/1 536/18 536/20 629/17 634/9 638/10 655/11 655/16 666/9 666/17 667/19
announced [1] 742/18	appropriately [2] 659/5 704/16
annual [3] 741/20 744/8 745/8	approve [15] 541/23 541/24 541/25 542/6 542/16 542/21 543/14 544/17 547/5 547/6 547/7 629/11 665/17 666/16 667/3
anonymous [7] 568/10 568/14 568/16 569/13 634/12 663/25 684/24	approved [8] 544/23 571/1 587/25 588/1 623/25 624/11 660/7 660/10
anonymously [2] 623/8 664/23	
another [34] 511/12 516/10 543/1 544/1 557/1 561/24 563/22	

<p>A</p> <p>approving [3] 542/25 666/20 666/23</p> <p>approximately [3] 692/2 737/12 737/16</p> <p>April [17] 549/16 549/16 585/21 585/22 588/25 596/14 610/19 611/22 611/22 612/1 629/5 629/14 629/21 681/16 707/7 711/7 711/9</p> <p>April 16th [1] 585/22</p> <p>April 2019 [4] 585/21 588/25 629/14 629/21</p> <p>April 4th [1] 611/22</p> <p>April 8th [1] 611/22</p> <p>April/May [1] 596/14</p> <p>are [350]</p> <p>area [6] 514/17 520/23 560/10 630/20 631/10 730/7</p> <p>Areas [1] 660/20</p> <p>aren't [2] 558/3 572/13</p> <p>argue [4] 520/14 520/16 522/8 522/12</p> <p>argument [7] 513/21 513/21 520/11 520/19 522/6 524/18 527/11</p> <p>arises [1] 640/7</p> <p>arose [1] 523/7</p> <p>around [19] 514/25 516/5 516/25 517/12 539/14 565/25 587/19 589/9 596/1 615/12 626/1 630/24 634/7 635/13 637/18 645/8 694/25 697/1 700/14</p> <p>array [1] 518/22</p> <p>article [1] 658/3</p> <p>arts [1] 731/5</p> <p>as [157] 509/15 509/19 510/11 511/7 511/22 512/8 512/13 512/17 512/21 514/13 514/19 515/8 515/9 515/10 515/10 515/12 515/13 515/24 519/4 519/6 519/9 519/14 519/17 520/23 522/22 523/8 523/24 524/14 524/25 525/20 528/4 528/4 528/17 528/23 529/8 529/8 529/9 529/25 532/23 533/19 534/4 535/21 536/13 538/16 540/16 546/17 568/22 572/5 574/4 574/11 582/10 582/10 597/12 597/22 604/4 607/3 616/9 617/19 617/20 617/20 617/20 619/23 619/24 620/16 628/5 634/19 637/8 637/18 639/22 640/7 640/23 641/8 641/12 643/22 644/2 645/15 646/12 646/14 656/15 657/17 658/13 662/10 662/10 662/19 662/19 665/2 665/5 665/20 672/17 673/1 674/7 676/8 679/13 679/14 683/4 686/24 690/5 690/19 690/21 691/2 691/3 691/7 691/10 697/17 700/17 700/18 700/19 700/21 700/21 701/3 701/24 704/9 704/11 704/11 705/2 708/25 709/8 709/13 709/23 715/7 719/2 719/12 719/13 720/1 723/17 724/9 724/9 724/10 728/2 728/25 730/19 732/1 732/14 732/16 735/24 736/4 736/8 736/18 736/19 736/24 738/1 738/8 738/10 738/21 743/21 745/14 747/11 747/11 747/25 748/4 748/11 749/22 751/17 751/17 752/15 753/21 754/16</p> <p>aside [1] 525/15</p> <p>ask [23] 510/15 510/16 511/4 519/11 532/1 537/1 575/17 584/10 609/12 617/15 629/16 639/21 643/6 643/11 674/14 674/22 679/4 685/4 701/16 725/20 727/10 727/13 733/16</p> <p>asked [37] 539/19 539/21 542/5 546/13 551/19 552/14 575/17 602/16 615/25 616/3 616/5 628/19 630/7 632/18 636/1 637/22 639/14 645/3 661/14 665/6 675/16 676/21 681/3 684/5 685/2 685/4 707/15 707/18 707/21 713/3 715/14 716/16 720/2 733/7 733/9 744/6 752/25</p> <p>asking [19] 525/5 528/4 542/14 545/19 602/3 604/18 635/20 637/18 645/7 658/24 665/17 679/22 679/23 686/12 686/14 716/13 721/15 734/23 745/1</p> <p>asks [3] 604/16 631/24 740/20</p> <p>asleep [1] 726/7</p> <p>aspect [1] 575/2</p> <p>aspects [2] 553/16 562/9</p> <p>assess [1] 735/16</p> <p>assessment [9] 697/2 698/1 734/4 734/8 734/24 736/8 736/8 736/13 739/6</p> <p>assign [1] 510/20</p> <p>assigned [3] 540/1 609/12 688/3</p> <p>assignee [1] 635/15</p> <p>assignee's [1] 635/16</p> <p>Association [1] 731/11</p> <p>assume [1] 670/14</p> <p>assumed [6] 655/6 655/8 742/8 743/16 748/6 749/3</p> <p>assumption [4] 523/23 743/21 748/9 752/1</p>	<p>asthma [1] 657/5</p> <p>ASTRAZENECA [99] 506/6 512/2 516/1 518/9 518/15 519/3 522/16 538/7 538/9 544/1 548/10 554/21 558/9 564/7 565/19 566/24 568/3 572/5 572/8 583/10 589/3 599/1 619/16 620/25 621/5 621/14 621/17 621/22 621/24 622/6 622/9 622/12 622/18 622/22 623/6 623/22 623/25 624/3 624/17 624/22 626/24 634/23 636/22 637/24 639/16 639/19 640/25 641/8 643/4 644/11 653/15 657/7 657/17 680/17 680/21 680/24 684/4 688/3 695/17 704/17 707/9 708/15 715/11 721/12 721/21 724/16 724/22 725/3 726/25 734/2 735/17 736/11 737/2 737/21 738/17 739/1 741/21 742/1 742/2 742/5 742/14 742/18 742/21 742/25 743/18 744/19 744/21 744/24 745/12 745/15 745/18 745/24 746/2 746/17 747/12 748/1 748/2 749/2 753/9</p> <p>AstraZeneca's [20] 521/4 619/12 619/19 619/23 620/6 620/15 621/8 621/10 621/12 621/20 624/8 625/6 634/16 634/22 635/20 635/23 636/1 636/14 636/17 636/20</p> <p>attached [3] 611/18 611/25 658/17</p> <p>attachment [3] 612/1 612/5 613/2</p> <p>attachments [1] 614/23</p> <p>attempts [2] 574/22 737/8</p> <p>attend [3] 669/23 699/23 700/6</p> <p>attended [1] 670/12</p> <p>attends [1] 571/22</p> <p>attorney [1] 684/20</p> <p>August [21] 539/7 545/25 546/3 546/7 546/9 591/24 652/10 663/7 663/12 663/13 663/16 663/20 663/23 664/3 664/5 664/17 669/9 676/16 676/19 706/22 711/15</p> <p>August 24th [2] 539/7 546/3</p> <p>August 31 [1] 545/25</p> <p>August/September [1] 663/16</p> <p>aura [1] 693/9</p> <p>authenticated [3] 523/21 525/10 641/18</p> <p>authentication [2] 524/12 529/15</p> <p>authority [2] 546/22 644/25</p> <p>automatically [1] 631/1</p> <p>available [8] 676/18 676/19 704/10 736/2 738/3 744/20 745/15 753/11</p> <p>Avenue [2] 507/12 507/22</p> <p>average [4] 632/7 632/9 653/10 750/16</p> <p>avoid [2] 659/6 660/20</p> <p>award [1] 510/2</p> <p>awards [1] 510/3</p> <p>aware [12] 513/22 527/25 530/3 664/10 694/10 716/13 736/1 741/2 742/18 742/25 748/17 750/20</p> <p>awareness [1] 637/2</p> <p>away [6] 564/23 606/17 669/4 669/6 679/10 683/19</p> <p>awfully [1] 552/13</p> <p>awry [1] 552/4</p> <p>AZ [1] 517/9</p> <hr/> <p>B</p> <p>B-E-N-S-O-N [1] 723/1</p> <p>bachelor [1] 731/5</p> <p>back [58] 510/8 510/12 510/17 511/5 531/21 532/2 537/9 544/8 545/17 546/12 550/21 551/1 551/2 551/4 555/23 560/4 563/8 567/25 569/11 580/3 580/20 583/12 584/1 586/6 586/21 587/13 588/4 588/24 592/8 592/9 592/13 593/1 594/6 594/16 595/13 605/4 605/19 606/24 613/25 617/15 648/14 674/15 674/17 674/24 676/3 678/2 678/5 678/23 679/5 680/5 684/19 688/14 695/19 702/12 726/16 734/23 753/4 756/7</p> <p>back-up [2] 555/23 593/1</p> <p>background [4] 523/8 555/8 731/2 736/9</p> <p>backing [1] 543/16</p> <p>bad [12] 511/12 558/7 562/21 576/24 607/11 607/14 607/15 611/2 673/19 705/14 705/15 705/16</p> <p>banter [1] 726/16</p> <p>Barbara [2] 508/5 619/3</p> <p>Barnes [4] 512/13 515/23 515/24 519/25</p> <p>base [3] 635/20 685/3 749/10</p> <p>based [23] 518/2 534/5 535/11 535/16 535/18 609/20 610/2 610/6 610/10 693/2 694/1 704/10 704/18 710/23 731/10 731/13 734/6 736/13 746/22 749/12 750/2 751/1 753/15</p> <p>bases [1] 733/6</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

B	743/3 743/16 746/4 746/7 748/8 748/23 749/21 750/1 750/7 751/24
basic [3] 571/3 577/10 586/18	before [56] 506/11 509/6 514/9 518/5 526/19 527/2 530/1 530/2 530/6 530/17 533/16 536/9 539/17 540/24 540/25 541/11 544/2 553/19 555/18 557/8 559/14 561/8 565/14 566/2 571/2 578/14 588/23 594/4 603/9 609/13 618/2 651/15 653/13 654/1 657/7 658/2 663/10 700/22 701/1 702/4 702/17 705/15 706/7 706/11 706/14 706/17 706/18 706/20 707/1 707/4 710/13 710/17 727/7 741/11 743/10 755/25
basically [12] 539/14 543/19 543/20 553/12 561/22 568/15 577/9 577/21 587/19 590/11 596/20 630/24	begin [1] 617/16
basics [1] 515/3	beginning [12] 539/18 548/1 548/7 548/20 557/3 560/5 576/23 578/9 656/20 676/9 703/4 703/11
basing [1] 751/18	begins [1] 528/24
basis [16] 513/3 525/7 535/9 535/9 535/9 535/10 535/10 535/10 535/13 535/13 535/14 535/15 535/15 535/15 535/16 535/17	behalf [2] 704/24 732/2
basketball [5] 699/7 699/13 699/25 700/23 701/22	behavior [8] 516/5 563/14 574/22 622/3 701/20 720/14 725/23 728/1
bathroom [1] 710/25	behaviors [2] 516/3 583/23
be [225] 509/5 509/6 509/12 510/18 510/20 511/6 511/12 513/4 513/20 515/18 517/17 518/14 518/20 521/10 522/4 523/2 523/24 524/12 524/14 525/1 529/18 530/15 530/25 531/10 532/12 533/11 534/4 537/1 537/5 537/7 538/22 539/6 539/19 539/22 540/1 541/4 541/14 541/20 542/2 542/3 543/4 543/6 543/20 544/7 544/12 544/23 546/13 548/5 550/9 550/11 550/12 550/19 554/24 554/25 556/23 557/23 558/11 559/10 559/18 561/3 561/14 562/6 564/25 566/16 567/14 567/16 568/5 568/22 569/16 570/6 570/6 571/3 572/5 574/9 575/3 575/5 576/4 577/14 577/16 577/17 577/19 578/10 579/9 580/7 580/21 584/23 586/11 586/11 587/21 587/22 588/1 588/9 589/18 589/25 590/14 590/15 590/20 592/1 593/3 596/13 597/15 598/4 601/15 601/16 601/19 603/17 608/19 608/22 611/23 612/2 612/21 613/5 614/8 616/6 616/7 616/23 617/5 617/8 617/15 617/15 618/6 618/15 623/20 623/25 625/5 626/17 626/24 629/8 630/1 630/4 631/3 632/7 633/11 634/9 635/13 637/6 637/19 641/24 643/13 643/21 644/22 646/1 646/25 648/7 648/8 648/11 648/23 649/14 649/19 651/24 653/25 654/16 658/5 658/10 659/21 660/9 660/11 660/13 660/14 660/20 664/21 666/9 666/24 668/6 670/17 671/15 671/25 672/20 673/21 679/23 680/8 680/14 681/9 681/12 684/4 688/12 689/5 689/18 692/20 698/9 701/21 702/8 704/21 706/3 708/9 708/13 708/20 709/13 709/21 710/18 710/18 713/9 715/22 715/22 716/7 717/22 718/5 722/2 722/13 722/21 727/4 728/6 729/7 729/17 729/19 734/7 735/10 736/1 736/14 736/21 738/3 741/8 743/20 745/22 747/10 748/6 749/14 749/17 750/12 750/17 754/8 754/12 755/25 756/6 756/10	being [50] 513/23 525/11 528/3 528/14 529/23 530/20 537/15 542/5 542/9 575/9 575/17 583/10 592/3 592/19 592/21 593/25 596/5 596/8 599/21 602/14 618/8 621/20 626/13 627/5 627/17 627/21 636/1 638/25 652/16 660/24 685/2 685/3 685/12 691/3 691/7 701/24 703/12 703/16 710/25 712/13 716/16 717/7 717/11 724/9 724/10 724/10 726/20 743/24 751/7 754/4
beach [2] 567/11 567/12	believe [50] 511/21 513/4 515/16 516/19 520/11 523/19 532/21 541/3 541/17 542/20 544/11 546/7 569/21 572/8 573/16 574/12 576/3 589/13 589/13 590/3 599/13 605/10 606/23 615/3 617/2 634/11 635/22 657/14 661/5 662/8 662/12 662/13 665/12 671/14 681/3 681/22 682/7 682/20 686/17 692/11 713/25 715/21 717/4 737/20 738/15 739/16 741/18 743/23 751/12 754/23
beautiful [1] 567/17	believed [5] 520/13 602/7 606/14 634/1 668/7
beautifully [1] 560/12	believes [3] 521/24 524/4 562/23
beauty [1] 603/5	Belknep [22] 521/17 529/21 568/23 572/25 577/2 577/14 578/8 583/22 589/3 589/13 590/9 628/13 628/15 675/7 675/11 675/16 680/13 685/22 706/15 712/8 712/16 715/16
Beaver [1] 712/4	bells [1] 593/14
became [5] 602/23 670/2 723/14 724/1 745/15	below [8] 561/11 629/20 653/10 653/13 665/9 666/2 737/13 757/3
because [138] 509/25 512/22 513/8 513/16 515/19 515/19 515/20 517/13 522/9 522/12 522/14 523/21 523/21 524/10 524/11 524/13 524/18 525/3 528/2 528/7 529/22 530/7 530/15 530/23 531/5 531/9 533/18 539/21 540/14 541/12 544/5 545/15 547/4 551/11 553/11 554/9 555/22 558/9 559/13 560/7 560/14 560/18 562/3 562/3 563/20 565/3 565/13 566/14 569/13 572/18 573/6 576/7 578/14 578/25 581/20 582/5 584/14 591/8 596/12 598/11 601/12 602/8 602/8 616/15 624/22 625/6 626/13 626/14 626/19 626/24 627/2 627/22 629/18 630/22 633/5 633/11 634/2 634/16 634/23 638/9 638/22 638/25 639/8 647/24 650/2 664/9 668/3 668/11 669/19 673/17 676/13 677/11 677/14 677/16 677/19 677/25 678/3 678/6 678/9 678/14 678/15 678/25 679/5 681/25 682/3 682/5 684/8 687/22 701/9 701/15 703/17 705/13 709/8 710/2 711/22 714/3 714/10 720/12 720/20 722/1 722/6 723/19 724/7 735/10 735/22 737/6 737/24 738/21 740/21 743/25 748/6 749/3 749/4 750/25 751/19 753/20 755/14 755/16	Benatar [28] 515/1 549/14 550/7 550/7 550/21 551/2 602/6 602/9 602/12 604/9 604/13 604/19 605/14 606/7 607/3 607/7 607/9 608/1 608/5 609/18 609/23 609/24 609/24 610/3 610/4 713/3 713/11 713/15
become [1] 736/1	Benatar's [2] 604/25 606/11
becomes [1] 740/21	benefits [6] 509/12 509/17 734/1 735/3 735/10 742/5
bed [4] 538/17 562/25 720/21 726/6	Benson [5] 508/9 511/21 722/17 723/1 723/8
bedroom [1] 562/18	beside [1] 522/12
been [86] 512/15 512/19 514/22 515/14 517/6 517/7 523/13 523/23 524/2 525/10 525/11 527/9 528/2 533/19 537/14 540/16 543/11 545/2 545/5 545/19 559/16 559/20 559/21 561/22 577/13 577/20 579/10 579/11 580/24 589/9 594/16 598/16 606/15 611/10 613/16 617/19 618/9 628/14 629/6 629/7 629/13 648/1 649/2 653/13 661/2 661/5 661/6 664/15 668/4 668/11 668/17 669/3 673/3 684/16 689/7 691/25 701/23 702/3 707/18 707/21 711/22 715/11 717/18 719/25 723/22 724/5 724/12 724/18 727/3 728/4 728/7 728/9 735/17 735/18 739/5 742/8	best [14] 562/1 585/7 590/20 602/14 604/13 604/24 605/12 643/13 666/15 703/15 719/12 723/14 741/6 755/19
	better [5] 540/12 541/7 661/21 696/2 696/3
	between [9] 545/4 599/1 615/17 641/6 645/2 651/5 703/1 704/12 741/14
	BEVESPI [2] 575/19 636/9
	big [8] 566/21 581/22 590/11 594/20 602/14 684/4 684/10 718/18
	bigger [3] 560/8 696/2 713/19
	biggest [1] 720/12
	bill [1] 731/19
	bio [9] 619/15 619/20 620/2 620/3 623/15 623/16 623/19 631/15 736/23
	bio-pharma [7] 619/20 620/2 620/3 623/15 623/16 623/19 631/15
	Bio-Pharmaceutical [1] 619/15
	bio-tech [1] 736/23
	BioPharma [3] 632/10 636/21 636/21
	BioPharmaceuticals [1] 631/9
	birthday [1] 721/8
	birthdays [1] 719/8
	bit [31] 539/8 545/15 547/11 552/2 553/10 555/7 556/16 560/6 561/11 561/13 564/3 568/25 570/18 580/20 581/7 581/11 587/4 597/14 632/25 643/10 645/5 646/21 647/23 664/2 671/9 715/14 724/6 727/24 728/22 746/8 754/13
	biweekly [1] 666/3

<p>B</p> <p>Blaire [1] 686/21</p> <p>blend [1] 650/14</p> <p>blindsided [4] 578/24 584/4 584/5 702/24</p> <p>blue [2] 527/17 665/12</p> <p>board [3] 512/9 714/23 731/9</p> <p>boat [3] 550/25 713/9 713/10</p> <p>Bockius [2] 507/6 507/9</p> <p>body [1] 601/14</p> <p>boils [1] 518/23</p> <p>Boise [10] 551/9 615/17 617/1 655/3 655/9 689/11 689/23 690/1 712/6 713/17</p> <p>book [1] 679/16</p> <p>booked [1] 679/10</p> <p>booking [1] 679/23</p> <p>both [9] 510/4 510/8 522/15 533/25 560/7 612/24 623/19 699/24 732/8</p> <p>bother [1] 628/18</p> <p>bothered [1] 627/25</p> <p>Botox [1] 694/12</p> <p>bottle [2] 515/3 713/15</p> <p>bottom [22] 512/12 515/23 543/23 545/24 564/20 570/12 571/8 581/10 614/24 615/25 637/1 653/5 653/8 665/2 673/2 674/20 675/13 689/21 689/23 689/25 702/19 702/21</p> <p>bottomed [1] 642/15</p> <p>box [5] 566/14 617/15 690/22 714/9 718/6</p> <p>boys [3] 699/7 700/7 701/13</p> <p>BPBU [1] 619/14</p> <p>brand [19] 550/24 552/8 552/10 552/11 552/15 553/18 553/18 586/17 658/8 659/6 660/7 660/9 660/9 660/10 660/14 660/21 661/3 686/25 743/17</p> <p>brand-new [1] 550/24</p> <p>branded [1] 738/21</p> <p>branding [4] 543/10 547/22 552/2 709/16</p> <p>brands [1] 659/22</p> <p>breached [1] 515/2</p> <p>breadwinner [1] 600/6</p> <p>break [14] 509/7 510/12 510/16 511/2 567/6 588/23 617/11 646/14 647/12 649/1 690/8 690/15 698/17 702/17</p> <p>breakdown [1] 582/25</p> <p>breakfast [1] 517/2</p> <p>breath [4] 545/2 545/4 561/17 671/17</p> <p>Brian [1] 563/2</p> <p>brief [5] 521/10 523/2 523/8 616/7 650/8</p> <p>briefly [5] 518/5 520/3 529/7 695/12 731/3</p> <p>bring [16] 531/20 531/21 533/16 559/25 594/8 605/2 622/22 648/14 649/1 649/4 657/4 686/14 687/2 687/5 695/19 714/14</p> <p>bringing [3] 579/11 597/15 597/17</p> <p>broad [3] 522/6 524/20 525/10</p> <p>broadly [1] 525/4</p> <p>broke [2] 697/7 697/12</p> <p>broken [1] 648/12</p> <p>Brook [1] 667/24</p> <p>brought [11] 544/18 552/23 569/25 572/12 589/18 627/3 634/5 634/11 634/12 634/12 672/6</p> <p>Broussard [2] 539/25 711/15</p> <p>bubbly [1] 721/1</p> <p>buck [4] 620/2 623/17 632/9 636/22</p> <p>budget [18] 582/5 676/13 676/14 677/14 677/16 677/17 677/20 677/21 677/25 678/3 678/4 678/6 678/9 678/14 678/15 678/25 679/5 703/16</p> <p>budgets [1] 679/22</p> <p>building [1] 602/18</p> <p>buildings [1] 618/14</p> <p>built [1] 546/1</p> <p>bullet [9] 574/12 599/2 614/21 643/19 643/20 643/25 644/1 644/4 659/1</p> <p>bunch [5] 524/24 560/11 586/13 676/2 687/21</p> <p>burden [1] 512/23</p> <p>Bureau [2] 750/16 751/5</p> <p>bus [16] 548/13 548/14 548/15 548/16 548/16 548/18 548/18 548/21 548/21 548/22 548/22 548/23 549/3 549/9 549/10</p>	<p>549/13</p> <p>bus' [1] 565/1</p> <p>bus,' [1] 548/25</p> <p>business [31] 521/4 539/2 546/24 547/19 586/18 593/5 593/10 612/24 619/15 619/20 620/2 623/15 623/16 631/10 631/13 632/10 636/21 636/21 637/6 641/9 641/19 643/20 644/2 644/8 666/14 666/16 666/23 666/25 667/4 677/8 703/16</p> <p>business-related [1] 641/9</p> <p>busy [4] 647/24 669/22 719/5 723/19</p> <p>Byrne [6] 523/14 523/14 523/15 523/20 523/24 524/13</p> <p>Byrne's [1] 525/7</p> <p>BYU [2] 736/19 737/16</p> <p>C</p> <p>C-A-P-E-L-L [1] 698/25</p> <p>C-level [1] 750/23</p> <p>CA [1] 507/7</p> <p>cabana [1] 567/12</p> <p>calculated [1] 734/6</p> <p>calculation [1] 510/11</p> <p>calendar [2] 568/4 586/24</p> <p>California [1] 725/12</p> <p>call [122] 510/25 512/22 517/3 523/10 527/3 537/7 537/18 537/20 539/4 539/16 539/17 539/21 539/23 539/24 540/7 541/1 542/13 542/18 544/13 545/12 545/16 545/20 546/4 546/10 546/14 546/15 550/16 551/7 551/14 551/15 551/16 551/18 553/6 553/22 553/24 554/7 556/14 557/20 559/24 559/25 560/15 562/8 562/10 562/11 563/25 565/17 565/18 568/2 568/12 568/15 569/6 569/8 569/10 571/25 574/2 574/3 574/5 577/7 577/7 577/10 577/11 577/17 577/18 577/19 577/25 578/2 578/3 578/9 578/10 583/25 584/3 589/7 589/12 589/12 589/16 590/1 591/2 591/14 591/21 593/3 593/4 593/5 593/12 593/21 593/24 593/25 596/23 597/1 597/4 597/5 597/7 597/12 598/2 599/6 599/9 599/11 599/16 631/14 648/1 648/10 648/13 653/20 654/1 654/2 656/20 656/23 663/5 663/11 665/5 670/11 676/9 677/9 686/12 688/13 702/25 711/14 712/16 713/23 717/23 718/1 719/9 722/16</p> <p>call,' [1] 580/16</p> <p>call,' [1] 560/16</p> <p>called [23] 523/24 526/19 527/5 537/2 542/19 544/15 550/9 550/20 563/13 587/2 599/18 600/5 609/17 610/3 629/16 648/23 657/24 660/3 709/10 711/12 713/11 715/21 735/14</p> <p>caller [5] 564/22 564/25 565/1 565/2 565/4</p> <p>caller's [1] 564/24</p> <p>calling [5] 512/9 539/3 550/12 586/11 610/14</p> <p>calls [19] 546/6 546/6 612/13 633/16 653/17 666/10 676/8 676/12 676/23 676/24 677/7 681/13 703/3 703/5 710/17 710/19 712/19 714/14 723/21</p> <p>came [20] 552/3 583/20 586/6 586/21 587/13 596/9 599/19 607/7 607/7 634/11 635/17 640/7 657/7 670/8 701/8 703/17 713/12 715/5 717/3 725/11</p> <p>can [118] 509/6 509/25 514/2 516/4 517/6 524/4 525/1 531/5 531/10 531/17 531/18 531/23 531/23 533/11 536/10 536/22 537/1 541/23 542/16 542/16 544/6 544/22 545/23 546/1 546/9 552/16 555/13 560/13 563/6 563/21 564/3 564/20 568/25 569/5 570/18 571/20 572/25 573/22 574/17 574/21 575/16 576/11 582/14 588/13 592/1 592/11 596/21 599/23 601/14 605/12 605/25 608/19 616/7 617/3 617/20 621/14 623/1 623/8 623/8 628/10 629/10 633/12 633/22 634/21 634/23 635/11 637/4 638/17 643/9 643/10 646/21 647/3 647/14 647/16 648/14 651/18 654/6 659/10 659/21 660/9 660/11 665/3 666/25 674/12 675/10 677/3 680/11 686/19 690/13 690/23 690/24 691/1 691/2 694/14 695/12 695/13 697/9 699/3 702/21 709/16 718/6 718/14 719/24 723/6 724/4 724/7 730/3 730/8 731/3 734/3 735/6 737/5 739/20 741/19 742/7 750/10 755/24 756/14</p> <p>can't [21] 529/12 536/16 541/24 544/11 563/24 565/2 579/6 584/6 587/21 587/22 589/24 591/8 592/16 596/2 601/18 648/8 660/22 667/7 667/10 688/16 710/21</p> <p>candidate [2] 735/25 738/2</p> <p>candidates [1] 735/2</p> <p>cannot [2] 544/6 755/5</p> <p>capacity [4] 731/1 732/3 738/14 739/2</p> <p>Capell [6] 508/7 511/20 698/25 699/3 699/5 702/5</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

C	
capture [4] 616/1 616/4 616/10 635/14	chosen [1] 737/1
captured [1] 635/11	Chris [8] 517/5 517/18 518/6 518/7 519/13 522/11 606/5 686/22
car [2] 598/6 653/25	Chris Thomsen [1] 518/6
care [10] 523/12 531/8 550/3 578/1 588/17 612/13 724/3 724/13 728/10 731/12	Christmas [5] 566/5 566/11 566/16 566/19 673/23
career [18] 516/1 517/11 518/16 522/2 580/19 684/11 717/6 719/16 719/25 720/1 724/5 724/9 725/3 730/10 735/16 735/18 736/12 747/22	Christmastime [1] 566/7
career-minded [1] 719/25	chronic [1] 585/14
carefully [4] 615/2 615/4 714/10 714/16	church [1] 719/15
caregiver [1] 600/15	circle [1] 592/17
case [40] 513/3 513/18 514/9 518/23 519/1 519/22 522/14 527/17 527/19 567/3 603/10 617/19 621/24 622/5 625/1 625/2 626/16 630/23 631/22 635/10 635/15 635/16 637/2 638/1 641/4 641/4 658/18 661/9 704/6 731/25 732/21 733/7 741/17 742/2 742/6 749/3 749/3 752/2 754/17 756/5	Circuit [1] 509/21
case-in-chief [1] 527/19	circulating [1] 515/2
cases [6] 631/19 732/7 732/7 732/8 732/14 751/3	circumstance [1] 533/12
cashier [1] 750/22	circumstances [3] 529/13 704/18 750/3
catch [3] 579/1 632/16 727/12	cities [8] 650/3 650/4 650/5 650/5 650/8 650/13 650/13 650/15
catch-up [1] 579/1	City [6] 650/24 655/13 655/17 655/23 656/5 711/4
category [2] 612/22 635/12	CL [2] 544/10 708/22
cause [2] 574/20 757/5	claim [4] 516/16 516/24 602/4 610/15
caused [1] 693/10	claims [9] 510/3 510/17 510/19 510/20 511/6 639/10 639/16 639/18 642/13
caution [1] 716/10	clapping [6] 593/17 593/20 593/22 594/8 594/13 594/13
CBD [7] 626/15 626/18 626/19 631/24 631/24 633/19 703/18	clarification [4] 524/25 528/4 528/7 536/17
Ceaser [15] 521/17 589/6 590/1 590/6 591/16 597/3 599/5 624/15 640/15 640/17 641/3 642/5 706/15 712/14 712/17	clarify [1] 527/21
celebrated [1] 618/6	clarifying [1] 667/17
certain [17] 509/15 510/19 511/6 512/1 512/3 518/15 518/16 518/18 518/18 522/1 525/22 526/24 533/22 630/21 634/9 648/24 735/10	class [1] 738/3
certainly [14] 526/16 527/25 528/5 529/10 529/17 532/3 532/6 533/6 537/3 557/22 618/11 641/22 725/5 734/15	classification [1] 751/8
certainty [5] 740/3 742/12 743/21 743/23 744/23	clear [11] 525/18 527/12 534/4 580/10 596/2 629/4 629/21 629/22 751/19 753/2 755/1
certification [1] 730/18	clerk [5] 528/12 532/22 532/24 618/22 691/12
certifications [2] 730/24 733/21	client [1] 730/20
certified [4] 730/16 731/8 731/12 757/7	clients [1] 732/18
certify [1] 757/3	clinical [4] 629/12 633/6 723/8 736/19
cetera [2] 660/23 660/23	close [9] 532/1 536/19 561/12 582/9 627/10 645/16 645/17 701/9 723/20
chain [3] 645/9 645/12 664/5	closed [4] 618/14 710/23 710/24 728/8
chair [1] 545/17	closely [2] 522/25 714/13
challenge [1] 659/23	closer [2] 661/18 661/20
challenges [1] 644/6	closing [4] 513/21 524/5 524/25 756/5
Chambers [12] 507/2 520/1 538/3 563/4 588/11 588/20 650/1 669/11 691/5 695/25 734/13 754/11	closings [1] 649/11
champion [2] 545/3 545/20	club [1] 699/14
change [10] 526/12 553/1 586/5 611/12 652/9 700/12 701/20 701/22 714/22 724/22	clue [2] 578/18 593/17
changed [6] 529/12 576/22 595/7 601/19 634/25 739/5	cluster [1] 715/21
changes [3] 588/24 686/25 748/17	coach [8] 518/17 592/19 613/9 650/21 650/24 654/6 677/5 687/9
character [8] 518/14 518/20 520/4 520/5 523/3 727/6 727/8 728/9	coached [3] 513/9 579/15 583/7
chart [1] 515/23	coaches [1] 517/8
chat [2] 700/7 721/6	coaching [128] 513/2 513/10 513/11 514/18 514/21 515/7 515/10 516/4 516/5 516/17 516/18 516/25 517/1 517/6 517/10 518/25 519/1 519/2 519/11 521/1 521/3 521/16 521/16 540/5 559/5 559/8 560/1 560/4 560/6 560/14 560/19 560/21 560/23 560/24 578/21 578/22 579/12 580/7 580/8 580/14 580/17 580/24 582/6 582/18 582/18 582/22 582/23 583/2 583/13 584/8 586/7 586/8 587/1 587/4 592/16 595/5 595/15 596/3 599/9 611/13 612/8 612/9 612/11 612/16 612/21 612/22 612/23 612/24 613/1 613/5 613/16 614/8 614/12 614/19 614/20 615/6 615/7 616/1 616/2 616/5 616/10 616/11 616/11 616/21 626/18 629/9 629/16 650/15 650/16 651/5 653/20 654/5 654/10 654/12 654/15 654/19 654/22 655/3 656/14 671/20 671/22 671/23 675/8 675/17 675/23 676/7 676/20 681/18 687/16 687/17 687/18 687/20 688/25 689/11 689/22 689/23 690/1 690/2 690/3 702/25 703/13 704/10 704/11 704/12 704/13 714/22 715/8 717/4
chatty [1] 700/7	coaching/field [1] 595/5
cheaper [1] 679/11	CoachMe [1] 586/25
check [3] 588/12 674/18 735/12	code [6] 620/15 623/7 623/10 634/25 635/1 635/1
checked [2] 533/19 567/4	codes [1] 697/17
checking [1] 676/10	cognitive [1] 730/12
cheerful [1] 701/24	collaborate [1] 641/6
cheery [1] 700/7	collaboration [1] 703/1
cherrypick [1] 518/15	colleague [2] 514/15 514/16
Cheryl [3] 508/6 691/6 691/18	college [7] 718/20 719/4 724/9 724/11 724/20 725/8 725/18
chief [3] 527/19 696/9 696/19	Colorado [1] 514/17
child [1] 652/4	Columbia [1] 732/11
children [3] 566/8 600/16 673/24	column [1] 686/21
chimes [1] 593/19	combined [1] 612/25
chipper [1] 566/23	
cholesterol [1] 693/5	
choose [1] 604/13	

C	
<p>come [33] 516/25 519/6 525/2 527/10 528/4 531/5 531/17 531/18 531/22 533/11 538/18 538/19 538/19 541/23 547/19 577/23 584/19 588/24 592/13 597/21 601/10 633/12 633/15 635/6 660/7 660/10 684/19 692/12 693/2 700/18 700/24 702/13 753/12</p> <p>comes [7] 620/1 623/15 632/21 635/10 714/6 730/20 756/3</p> <p>comfort [1] 556/4</p> <p>comfortable [6] 542/24 543/15 623/9 626/20 718/7 725/21</p> <p>coming [15] 523/15 524/13 529/16 540/5 541/6 553/2 570/3 700/17 700/18 700/21 700/22 700/23 701/6 740/14 741/11</p> <p>comment [12] 606/19 607/10 610/14 610/15 610/16 610/19 610/22 611/1 611/8 711/5 711/6 721/7</p> <p>comments [1] 665/12</p> <p>commercial [1] 546/24</p> <p>commit [1] 531/20</p> <p>committees [1] 677/11</p> <p>commonly [1] 509/14</p> <p>communicate [3] 594/18 639/23 640/8</p> <p>communicated [1] 629/4</p> <p>communicating [3] 713/23 714/2 726/13</p> <p>communication [5] 620/22 640/23 703/1 714/3 714/13</p> <p>communications [2] 641/5 641/10</p> <p>community [1] 724/10</p> <p>Comp [1] 732/7</p> <p>companies [2] 718/18 735/9</p> <p>company [25] 513/9 513/22 548/7 562/15 562/23 562/23 580/22 598/18 601/1 605/25 606/16 622/20 654/4 680/19 681/2 681/17 708/5 708/14 709/10 709/21 718/16 724/21 734/1 738/23 738/24</p> <p>company's [2] 606/16 679/24</p> <p>comparable [2] 601/8 747/6</p> <p>compared [1] 748/11</p> <p>comparison [1] 516/9</p> <p>compelling [1] 513/18</p> <p>compensate [1] 748/7</p> <p>compensation [2] 730/11 739/20</p> <p>complain [3] 607/13 610/25 664/5</p> <p>complained [7] 607/20 608/5 663/6 681/25 685/15 686/2 686/11</p> <p>complaint [51] 563/19 564/9 565/20 565/24 566/1 566/2 567/22 568/3 568/7 568/9 568/14 568/16 576/11 576/25 578/15 589/22 601/16 607/21 611/7 627/17 664/3 664/11 664/21 672/17 672/21 673/2 673/8 673/12 673/17 684/22 684/23 684/24 684/24 685/5 685/10 685/12 685/13 686/3 696/9 706/7 706/11 707/2 733/25 751/14 751/15 751/16 753/7 753/8 753/12 753/16 753/19</p> <p>complaints [23] 589/20 591/5 599/4 624/23 626/14 626/15 626/17 627/15 628/1 628/7 628/17 628/24 637/12 644/14 682/9 685/8 685/22 696/19 703/18 706/14 706/20 706/21 707/6</p> <p>complete [3] 595/20 648/21 697/19</p> <p>completed [5] 595/8 676/18 676/20 739/6 739/13</p> <p>completely [12] 522/2 539/6 545/3 561/25 578/24 593/21 647/23 662/8 726/1 726/7 728/3 728/8</p> <p>compliance [84] 514/24 517/9 519/12 543/10 543/16 544/17 544/21 545/3 545/8 545/18 545/19 546/8 554/1 564/17 566/25 570/25 576/2 588/2 591/24 619/13 619/14 619/20 620/1 620/5 620/6 620/19 621/25 622/1 622/2 622/6 623/4 623/14 623/16 624/3 624/4 624/7 624/7 624/23 627/3 628/5 630/19 631/2 632/11 634/5 634/6 634/16 635/5 636/14 636/20 636/22 638/11 639/22 640/5 641/6 641/9 644/14 663/15 663/25 664/7 664/9 664/17 664/23 665/9 665/19 665/20 665/21 666/15 666/20 666/21 666/22 666/25 667/1 667/3 667/6 668/7 668/25 669/1 675/4 682/11 683/13 683/23 684/22 708/17 736/20</p> <p>compliant [8] 541/15 542/9 657/17 659/6 665/11 667/1 667/5 667/6</p> <p>complied [1] 519/8</p> <p>complies [1] 621/6</p> <p>compliment [1] 550/2</p> <p>comply [6] 514/18 528/6 655/12 655/16 655/22 656/4</p> <p>component [1] 602/10</p> <p>components [1] 510/13</p>	<p>compromise [1] 514/10</p> <p>computer [4] 586/20 592/15 598/5 693/10</p> <p>concede [1] 530/18</p> <p>concern [16] 511/25 513/15 524/20 525/4 525/10 531/6 531/6 622/22 627/13 627/14 632/5 632/15 632/17 632/25 633/3 673/3</p> <p>concerned [29] 524/6 524/24 541/12 556/17 570/4 573/8 578/20 579/14 624/17 624/21 625/5 626/23 627/1 627/12 627/19 627/20 627/22 628/6 628/9 628/14 628/16 628/23 630/1 630/4 632/8 670/2 670/20 672/5 682/14</p> <p>concerning [5] 574/14 574/16 672/8 673/7 754/4</p> <p>concerns [31] 511/14 573/3 583/7 591/5 598/21 621/25 622/1 622/6 622/10 622/19 623/6 634/5 636/15 644/6 665/10 665/19 671/19 672/13 675/8 676/13 677/14 678/3 678/6 678/9 678/14 678/16 678/25 679/6 689/10 703/19 704/14</p> <p>concert [1] 651/19</p> <p>concluded [5] 744/7 747/10 749/13 749/17 749/19</p> <p>concluding [1] 750/12</p> <p>conclusion [8] 509/11 742/12 743/12 743/14 744/22 748/18 749/8 751/18</p> <p>conclusions [4] 573/5 740/14 741/11 744/25</p> <p>condition [2] 524/9 529/25</p> <p>conditions [2] 697/5 697/13</p> <p>conduct [9] 620/12 620/15 621/22 623/7 623/10 631/3 635/1 744/17 752/16</p> <p>conducted [4] 627/2 627/23 676/23 704/11</p> <p>conducting [1] 677/9</p> <p>confer [3] 531/25 532/24 646/25</p> <p>conference [7] 523/18 535/22 618/25 646/13 677/9 691/15 744/1</p> <p>confident [1] 647/3</p> <p>confirm [8] 528/13 532/21 536/16 639/6 695/7 714/17 745/7 745/20</p> <p>confirmed [2] 554/9 554/12</p> <p>conformed [1] 757/6</p> <p>confront [1] 556/8</p> <p>confuse [1] 519/21</p> <p>confused [2] 545/15 553/1</p> <p>connect [1] 687/3</p> <p>connection [3] 603/9 688/9 707/12</p> <p>consent [6] 584/11 585/2 639/6 639/12 642/10 645/8</p> <p>conserve [1] 531/25</p> <p>consider [4] 690/20 691/10 734/8 734/24</p> <p>consideration [2] 743/2 743/6</p> <p>considered [9] 518/12 524/14 538/15 565/1 625/6 626/24 704/20 709/21 734/9</p> <p>consistent [25] 531/12 532/18 534/7 534/8 534/10 534/13 534/14 534/17 534/18 534/19 534/21 534/22 534/23 535/3 535/4 535/5 535/6 535/7 644/10 646/4 658/5 660/13 667/19 704/17 723/22</p> <p>consistently [3] 513/5 513/23 520/15</p> <p>constructive [1] 517/14</p> <p>consultant [2] 718/17 730/5</p> <p>contact [7] 582/9 667/20 672/9 672/15 717/14 723/20 726/14</p> <p>containing [1] 524/9</p> <p>contend [2] 513/1 513/2</p> <p>contest [1] 603/5</p> <p>context [10] 512/8 512/10 513/15 516/23 541/8 541/13 541/18 542/11 672/19 702/22</p> <p>continue [8] 533/11 571/17 585/9 588/20 618/9 648/3 649/20 735/8</p> <p>continued [3] 549/9 644/6 727/8</p> <p>continues [2] 599/4 637/11</p> <p>continuing [2] 689/21 713/25</p> <p>contours [1] 646/15</p> <p>contrast [1] 516/13</p> <p>control [2] 585/15 636/3</p> <p>convenience [1] 511/23</p> <p>conversation [22] 539/13 544/19 552/8 553/12 555/10 562/14 563/15 565/15 570/7 580/13 615/19 616/7 638/3 655/7 655/14 667/12 676/5 688/14 688/16 688/18 689/4 689/12</p> <p>conversations [1] 634/10</p> <p>cooking [1] 721/1</p> <p>coordinate [1] 687/3</p>

C	cowbell [1] 594/11 cowbells [5] 593/13 593/19 594/8 594/9 594/14 crazy [3] 554/10 554/13 594/10 cream [1] 550/3 create [2] 659/22 667/2 credit [4] 731/6 748/11 748/19 748/24 criminal [2] 754/18 755/4 criteria [4] 630/21 630/22 630/24 632/22 critical [1] 522/15 critically [3] 516/18 621/24 622/5 criticism [1] 517/14 cross [14] 508/3 601/25 602/1 642/19 643/1 648/9 648/21 649/21 695/14 722/10 728/16 728/17 740/7 740/8 cross-examination [8] 602/1 643/1 648/21 649/21 695/14 728/16 728/17 740/8 CRR [2] 507/21 757/9 cry [2] 562/19 563/24 crystal [1] 534/4 cue [1] 646/6 culture [3] 621/19 622/4 634/19 cumulative [2] 513/16 519/20 curious [2] 639/8 642/14 current [2] 624/25 625/2 currently [3] 600/23 723/9 744/18 customer [36] 559/9 578/22 579/5 579/5 582/7 612/8 612/9 612/11 612/16 612/22 612/23 613/9 613/17 614/8 614/12 614/19 615/7 617/8 650/18 650/21 650/24 651/6 654/11 654/12 654/15 654/19 659/21 659/23 671/22 671/23 672/1 676/8 681/10 690/3 717/5 717/5 customers [2] 578/21 676/11 cut [8] 523/3 579/24 580/4 623/1 649/5 678/2 678/5 679/5 cv [1] 506/4 cycle [1] 715/24
D	D.C [1] 730/7 daily [1] 693/8 DALIRESP [37] 551/11 551/13 551/21 551/22 551/22 551/23 551/25 552/5 552/6 552/21 555/6 558/2 564/11 570/1 570/22 572/12 572/13 572/15 572/16 573/3 573/14 574/6 574/13 574/19 575/8 575/14 575/20 636/9 669/17 669/24 671/6 672/5 672/8 673/3 673/11 673/14 711/21 damages [3] 510/15 510/21 511/2 Danger [1] 576/8 dangerous [3] 556/9 574/23 576/4 darn [2] 561/11 568/18 data [14] 538/11 538/17 538/19 538/22 554/12 554/12 580/25 587/1 587/2 592/17 660/22 665/13 739/5 751/7 database [2] 635/18 687/16 date [24] 526/2 530/12 532/11 573/25 589/10 596/24 611/4 611/19 615/11 626/5 626/6 626/7 629/14 631/18 631/20 635/6 674/18 687/2 692/23 694/5 746/12 749/24 750/1 757/9 dated [4] 545/25 571/9 594/22 625/17 dates [2] 694/5 696/21 dating [1] 718/24 Dawn [25] 508/9 521/17 589/6 589/7 590/1 590/6 591/2 591/16 597/3 597/19 599/5 624/15 638/2 640/15 640/17 641/3 642/5 712/14 722/17 723/1 723/1 723/6 723/8 727/17 728/13 Dawn Ceaser [1] 712/14 day [28] 528/11 542/19 542/20 542/20 543/2 543/19 551/12 555/18 567/4 570/16 573/7 587/22 604/8 629/10 651/20 651/20 672/17 673/4 673/12 676/9 676/11 676/11 676/12 703/4 703/11 749/23 755/15 755/19 days [58] 517/9 518/11 543/18 559/5 559/8 560/1 560/4 560/23 560/24 569/20 569/21 570/3 582/18 582/19 582/22 582/23 583/2 583/4 583/13 586/7 586/8 587/4 587/5 587/17 611/24 612/2 612/6 612/21 612/24 613/1 613/16 613/25 614/2 614/8 614/20 617/5 639/2 639/5 654/18 656/15 671/20 675/18 676/18 676/19 676/19 676/20 681/18 685/20 685/20 685/24 688/25 699/15 699/16 704/10 704/11 714/22 717/4 719/8 DC [1] 507/4 deal [3] 525/16 684/4 684/10 dealing [2] 527/9 576/20

D	
dealt [1] 509/12	detail-oriented [1] 724/2
December [42] 547/11 547/12 551/6 554/19 555/3 555/14 555/16 562/8 564/11 565/25 580/24 606/23 606/25 607/1 607/4 607/21 608/3 611/7 630/3 630/6 651/10 651/17 663/5 664/4 664/9 664/11 669/10 670/1 671/2 671/13 672/10 673/25 674/15 674/24 682/13 682/21 703/18 706/8 706/12 706/22 706/23 707/6	detailed [1] 692/8
December 10th [4] 547/12 551/6 669/10 670/1	detect [1] 620/12
December 17th [3] 554/19 555/3 555/14	determination [1] 510/24
December 18th [8] 555/16 562/8 564/11 565/25 651/10 651/17 671/13 682/13	determine [6] 518/1 730/25 744/12 745/3 745/11 747/7
December 18th meeting [1] 672/10	determined [1] 704/8
December 19th [1] 630/3	determines [2] 509/22 510/1
December 19th of [1] 630/6	determining [1] 510/22
December 2018 [4] 547/11 607/21 673/25 703/18	devastated [6] 562/11 562/17 562/24 566/7 590/14 591/8
December 2019 [1] 706/8	develop [1] 677/5
December of [1] 706/12	developed [2] 623/22 652/16
decide [3] 514/9 563/1 666/24	development [7] 612/24 652/13 708/16 708/18 708/20 708/22 708/23
decided [5] 585/1 608/18 672/9 672/15 680/16	development/DSM [1] 708/23
decision [16] 517/25 518/5 518/9 518/11 518/12 518/19 521/18 521/23 521/23 531/7 625/25 644/21 644/25 666/14 704/19 704/20	developmental [2] 588/3 677/8
decision-makers [2] 521/18 644/21	diabetes [1] 696/15
decisions [3] 637/18 637/22 644/23	diagnosed [1] 696/5
deck [2] 658/17 668/13	diagnoses [1] 697/19
decorate [2] 673/23 674/5	diagnosis [3] 694/1 697/17 697/25
decorating [1] 674/7	dialogue [2] 601/15 601/18
decorations [2] 566/12 566/13	did [272]
deemed [2] 525/19 526/8	didn't [114] 518/17 519/11 522/11 527/6 538/20 541/12 543/15 547/4 547/6 547/7 548/24 550/21 550/23 550/25 551/1 551/22 553/2 555/24 561/2 562/11 563/9 564/15 565/9 566/13 573/16 580/6 591/22 594/14 598/17 598/21 599/7 603/18 606/17 606/19 606/22 607/9 607/13 608/1 609/1 609/12 609/14 609/15 610/1 610/17 610/22 610/25 610/25 611/8 613/9 615/4 615/6 615/10 615/18 628/15 632/6 632/16 638/7 638/9 638/12 638/20 639/8 639/8 644/1 655/2 655/22 656/3 656/12 663/1 664/3 664/8 668/12 670/14 671/10 677/22 678/14 678/25 679/7 679/9 681/15 681/21 681/23 681/25 682/3 682/5 683/7 683/11 683/13 686/9 687/24 688/5 694/19 700/18 701/19 701/23 711/24 713/10 713/25 714/1 717/7 717/11 720/17 720/21 726/5 727/12 741/15 743/8 744/15 744/17 745/11 745/14 745/17 745/20 750/13 751/22
defendant [10] 506/7 507/6 517/18 521/24 522/24 526/13 527/3 529/2 533/11 534/11	die [8] 552/12 556/12 556/20 557/21 570/1 571/14 670/5 670/9
defendant's [3] 526/7 528/17 528/22	differ [1] 516/15
defense [5] 521/20 554/14 554/15 646/13 739/14	difference [1] 623/20
defer [1] 531/20	different [41] 513/14 514/2 514/17 520/22 548/11 553/16 560/11 572/11 578/17 580/1 580/2 580/2 581/22 581/23 586/14 586/17 593/19 626/15 630/20 632/25 641/4 662/17 662/18 701/23 702/3 708/24 710/16 710/19 720/23 720/24 725/4 725/13 725/15 725/22 726/1 726/7 748/6 748/10 749/6 749/6 749/7
defines [1] 509/19	differently [2] 705/3 738/22
definitely [5] 621/2 702/3 720/24 725/21 726/14	difficult [1] 740/22
degree [1] 740/2	difficulty [2] 687/12 687/15
degrees [1] 731/4	digitally [1] 757/6
Delaware [3] 710/11 710/22 710/24	diligence [3] 553/20 554/2 620/11
delay [1] 533/9	diligently [1] 617/19
deliberations [2] 649/11 756/5	diminished [3] 748/21 748/22 748/23
deliver [1] 690/5	DiNunzio [92] 512/19 513/9 514/19 514/23 515/6 518/4 519/3 519/11 520/8 522/9 530/17 539/11 539/18 539/24 555/16 578/3 602/7 602/16 602/23 603/15 604/4 604/18 605/4 605/6 605/19 605/21 606/11 607/11 607/16 610/12 610/16 611/15 614/17 615/9 615/21 616/4 616/19 625/3 626/16 633/19 634/2 635/19 650/20 650/23 651/15 651/21 651/25 655/2 655/11 658/13 659/3 665/4 665/14 665/21 668/9 668/20 669/12 670/2 670/8 670/16 671/2 672/18 673/10 673/13 674/15 674/23 675/7 675/17 675/21 675/25 676/6 676/13 676/17 678/8 678/23 679/4 680/13 682/1 682/8 682/14 683/3 686/11 686/20 686/21 687/15 689/1 689/10 704/7 706/20 706/25 711/14 712/9
delivering [1] 644/7	DiNunzio's [6] 518/19 597/2 633/21 662/23 663/2 675/7
demeanor [1] 700/6	diplomat [1] 731/9
demonstrate [2] 512/23 522/15	direct [13] 508/3 538/4 619/5 633/20 649/24 651/4 663/20 691/20 699/1 718/12 723/4 730/1 755/10
denied [1] 732/16	directly [2] 514/20 634/7
Dennis [4] 507/21 588/12 757/8 757/9	director [2] 546/25 743/17
deny [1] 522/20	disabilities [1] 730/12
departed [1] 521/2	disagree [2] 520/16 521/9
department [7] 563/18 639/24 664/23 665/21 667/21 668/10 736/20	disallow [1] 532/9
departments [1] 639/25	disciplinary [1] 644/19
Depending [1] 641/4	discipline [6] 529/23 530/2 530/3 530/13 531/13 583/15
depends [2] 579/23 579/24	
deposed [1] 521/7	
deposition [11] 519/1 655/25 658/2 661/9 661/11 661/23 690/20 741/10 741/13 741/14 741/16	
depressed [2] 574/19 636/2	
depression [22] 574/14 574/25 575/9 575/20 587/20 600/14 636/10 685/10 685/11 693/7 693/11 693/22 694/2 696/5 696/18 696/23 697/25 705/7 706/11 706/17 706/25 707/1	
depth [1] 554/25	
describe [6] 520/6 687/17 719/11 719/13 723/24 731/3	
described [6] 518/13 531/13 645/9 676/8 701/24 737/25	
describes [1] 696/13	
description [2] 541/25 659/25	
descriptions [1] 744/11	
design [1] 718/17	
designation [3] 631/23 731/10 731/13	
despite [1] 522/8	
detail [4] 512/7 564/6 724/2 725/14	

D	DOB [1] 754/24
disciplined [6] 529/23 531/10 715/10 717/7 717/12 717/13	Dobber [1] 631/9
disclosed [6] 630/3 630/5 633/19 634/1 635/19 635/25	doctor [8] 529/13 648/10 648/14 649/9 656/20 705/2 715/17 716/3
disclosing [1] 636/15	doctor just [1] 705/2
discovery [1] 521/7	doctors [6] 539/1 552/18 575/3 575/4 714/18 716/14
discrepancies [1] 704/12	doctors' [1] 703/6
discretion [3] 618/9 618/12 665/7	document [26] 530/24 559/13 560/24 561/1 611/24 612/20 613/24 614/1 614/4 614/13 625/15 625/15 625/17 630/14 635/9 635/14 637/15 641/18 643/12 671/4 671/9 671/12 675/16 692/14 692/17 695/7
discriminated [1] 602/7	documentation [6] 521/18 582/12 582/13 587/24 704/5 752/20
discriminating [5] 609/20 610/2 610/5 610/10 634/2	documents [13] 519/9 519/15 521/8 525/20 525/20 590/15 590/17 611/18 624/3 643/7 704/5 733/23 754/3
discrimination [8] 516/24 518/3 583/24 589/21 602/4 606/15 607/20 635/13	does [35] 510/10 516/13 542/13 552/9 556/17 578/4 578/5 587/16 590/18 594/18 597/20 605/15 610/7 639/17 643/25 666/15 676/7 684/8 693/16 703/2 706/25 713/21 719/15 719/15 730/8 731/20 732/21 734/15 737/2 737/4 738/17 739/1 739/17 743/2 752/18
discuss [5] 555/1 579/15 675/7 693/4 754/17	doesn't [16] 519/5 526/15 531/8 541/11 554/11 564/25 580/10 585/15 599/24 628/18 666/20 666/22 667/2 667/3 667/10 734/14
discussed [14] 510/7 514/23 562/9 568/13 569/7 574/5 577/19 581/13 615/22 650/1 665/5 669/23 703/1 735/2	dog [2] 631/13 631/14
discusses [1] 702/25	doing [52] 538/14 555/11 555/19 557/16 558/13 558/14 559/2 559/17 559/18 559/21 560/21 564/22 571/6 572/13 573/9 574/10 576/17 576/19 577/20 578/10 579/2 579/12 580/14 580/21 580/23 584/20 585/6 585/24 592/14 593/5 593/18 593/19 593/22 594/5 601/13 616/3 616/6 684/9 684/15 688/13 689/18 689/18 695/18 703/15 710/17 710/18 714/1 714/6 714/12 724/19 730/13 730/20
discussing [4] 533/21 555/8 735/9 735/11	Dominican [4] 566/22 567/2 567/25 674/9
discussion [22] 519/16 526/13 564/16 573/24 580/15 582/5 597/10 597/10 615/13 616/25 641/19 646/4 655/21 655/24 656/1 656/1 663/6 665/25 672/23 682/20 714/5 716/9	Dominican Republic [1] 566/22
discussion,' [1] 560/16	don't [143] 519/8 520/4 522/22 524/18 526/12 528/8 528/15 529/11 532/1 540/25 541/4 541/5 541/6 541/7 541/13 541/14 541/18 541/19 541/20 542/2 542/3 542/24 543/4 543/5 545/1 545/4 546/19 549/21 550/19 554/2 556/9 556/10 556/11 557/6 557/21 557/22 557/25 558/1 558/5 558/8 558/22 558/23 559/15 562/3 562/20 564/13 567/13 570/8 571/13 573/25 574/23 578/24 590/16 593/22 594/8 594/10 594/11 594/13 594/15 597/8 598/20 599/13 607/12 616/4 623/19 625/24 626/5 626/7 631/19 633/10 633/12 635/6 635/7 636/4 636/5 637/19 640/21 643/14 644/4 644/25 645/11 649/10 657/14 657/21 660/6 660/24 661/1 661/5 661/7 661/7 661/7 662/8 662/12 662/12 662/14 663/3 663/4 667/9 667/14 673/7 678/15 678/24 679/24 682/2 682/7 683/19 684/25 684/25 686/1 687/19 687/19 688/12 688/13 689/3 689/4 689/7 692/3 697/24 701/19 703/6 709/4 709/18 710/8 712/6 716/9 724/20 725/8 725/14 728/13 729/5 741/18 743/23 744/6 745/23 746/1 748/2 749/15 751/6 751/12 751/23 755/16 755/24 756/6
discussions [5] 581/18 616/2 616/11 677/8 689/1	done [15] 528/12 562/8 565/2 565/13 565/14 576/9 638/10 646/3 646/20 646/22 648/18 687/17 724/9 756/1 756/1
disease [1] 696/20	dorms [1] 723/14
dismissal [1] 734/25	dos [1] 595/8
display [1] 695/13	dosing [1] 577/23
displays [1] 642/21	double [1] 735/4
dispute [1] 519/4	doubt [1] 682/2
disputes [2] 524/24 528/8	down [40] 509/8 510/12 518/23 543/23 546/1 555/13 556/5 564/1 564/3 564/14 567/6 568/25 569/5 570/18 571/8 571/20 572/10 572/12 572/18 573/22 581/7 581/10 582/14 592/11 604/14 625/21 635/15 637/1 637/5 642/5 649/5 654/18 673/1 690/11 694/14 705/25 722/15 725/16 728/3 728/8
disputing [1] 530/18	downright [2] 557/7 558/18
disruptive [1] 714/11	downs [1] 705/24
distance [3] 616/2 616/5 616/10	downtown [2] 711/2 711/3
distant [4] 616/23 689/22 690/1 690/2	Dr [1] 511/1
distantly [1] 616/21	Dr. [19] 510/10 523/12 523/14 523/14 523/15 523/20 523/24 524/13 525/7 690/23 691/6 691/18 691/22 694/2 695/16 697/9 698/6 754/12 754/25
distracted [3] 720/22 725/15 726/4	Dr. Byrne [6] 523/14 523/14 523/15 523/20 523/24 524/13
distraction [1] 659/6	Dr. Byrne's [1] 525/7
distress [3] 511/6 705/2 715/15	Dr. Cheryl [2] 691/6 691/18
distribution [1] 666/4	Dr. Edelman [2] 510/10 754/12
district [55] 506/1 506/2 506/12 507/21 512/11 512/13 512/15 539/19 547/19 569/20 569/22 570/21 571/21 573/23 574/3 579/24 581/16 581/18 581/19 581/20 581/22 581/25 582/1 586/9 586/16 586/18 601/3 617/7 652/12 653/16 657/11 663/1 666/6 682/18 682/18 682/24 683/4 686/17 704/7 704/9 712/2 713/15 732/10 732/10 732/11 732/12 736/25 742/15 742/21 742/24 746/10 747/15 747/25 748/4 749/1	Dr. Johnson [7] 523/12 690/23 691/22 694/2 695/16 697/9
district's [1] 576/15	
division [1] 710/22	
do [231] 509/18 509/18 511/25 518/15 519/2 521/5 521/12 527/4 533/21 536/14 537/15 539/6 544/6 546/22 547/24 549/6 549/7 550/4 550/9 550/13 550/17 551/7 551/22 553/13 553/13 553/20 554/1 554/3 554/4 555/24 555/25 557/6 557/15 557/15 557/17 558/3 558/11 558/19 559/1 560/6 560/17 562/13 563/1 563/1 563/8 563/9 563/13 564/12 564/24 565/3 565/5 566/7 566/9 566/13 566/13 566/14 566/15 569/20 570/4 571/9 571/24 577/1 577/4 579/3 580/3 580/15 582/6 582/8 582/11 584/13 585/7 585/7 585/8 585/9 585/9 585/10 585/11 585/23 586/10 586/14 586/15 586/18 586/25 587/7 587/8 587/9 587/11 588/13 591/5 591/22 592/18 595/8 595/17 596/23 596/25 597/7 598/6 598/13 598/17 598/21 604/13 604/16 609/15 615/21 616/20 616/24 622/11 622/21 623/8 623/8 625/15 625/16 629/18 631/5 634/14 637/3 640/11 640/13 640/14 643/15 643/23 645/10 645/21 646/17 647/14 647/19 648/17 650/15 650/18 651/8 651/22 651/23 658/4 659/25 660/23 660/24 661/9 665/2 666/25 667/1 668/6 668/7 670/12 674/7 674/20 676/25 677/2 677/14 678/25 679/16 680/1 681/15 682/13 684/23 688/11 690/8 690/15 691/22 692/2 692/6 692/7 692/8 692/11 692/13 692/21 692/22 693/12 694/8 694/15 694/17 694/18 694/20 694/22 696/8 697/4 699/6 701/10 703/10 704/2 710/10 710/20 711/16 711/22 711/23 712/19 713/21 714/1 714/25 715/10 716/16 716/19 718/14 718/19 719/1 719/6 719/16 720/18 721/3 723/7 723/9 723/11 723/15 724/4 724/16 724/19 724/21 725/7 728/22 728/25 729/3 730/4 730/9 730/21 733/7 737/20 738/15 741/6 742/14 745/3 745/7 745/10 745/11 745/17 745/20 746/3 746/4 746/7 746/19 751/21 754/17 755/21	

<p>D</p> <p>Dr. Johnson... [1] 698/6</p> <p>Dr. Johnson's [1] 754/25</p> <p>draw [1] 548/24</p> <p>drew [1] 548/22</p> <p>drive [1] 693/9</p> <p>driven [3] 538/22 719/13 719/22</p> <p>driver [1] 629/17</p> <p>drop [4] 514/6 514/10 517/19 522/24</p> <p>drug [1] 556/22</p> <p>drugs [2] 622/20 624/8</p> <p>dry [2] 579/24 580/4</p> <p>DSM [25] 512/18 514/15 515/5 515/7 515/11 515/12 515/18 515/20 516/3 516/10 516/11 517/5 519/14 546/13 608/13 616/15 626/10 626/11 631/23 631/25 665/7 675/18 677/2 683/4 708/23</p> <p>DSMs [27] 512/16 512/17 513/8 586/19 592/24 592/25 593/4 602/16 608/13 608/18 609/2 609/17 610/1 610/5 611/13 611/16 614/16 629/22 665/6 665/10 666/4 677/4 681/20 686/12 709/15 709/16 715/5</p> <p>due [8] 553/20 554/1 618/7 620/11 638/22 644/6 693/9 704/14</p> <p>duly [7] 537/24 618/24 691/14 698/22 718/8 722/22 729/18</p> <p>during [29] 511/23 515/6 524/25 525/22 526/4 536/2 536/13 538/9 541/2 551/9 557/14 564/11 566/18 595/10 615/22 646/4 646/4 649/1 654/2 671/4 671/12 696/5 701/10 715/17 720/14 720/25 723/13 725/3 733/16</p> <p>duties [6] 586/5 640/24 640/25 644/7 704/9 730/19</p> <p>dysphoria [1] 693/16</p>	<p>586/24 591/17 591/20 591/25 592/5 594/4 594/22 596/10 596/12 599/1 611/15 611/23 611/25 612/1 613/2 614/16 624/20 625/22 629/20 630/13 637/25 640/11 640/13 645/2 645/9 645/12 649/24 649/25 650/20 650/22 650/23 651/1 651/3 651/10 658/13 658/17 658/21 658/25 664/1 664/5 664/24 665/1 665/3 665/9 665/14 665/20 666/3 666/8 667/8 667/18 674/18 686/19 686/21 687/16 688/17 689/7</p> <p>emailed [1] 664/25</p> <p>emailing [1] 574/8</p> <p>emails [19] 580/6 592/19 593/25 596/8 624/14 641/3 641/8 663/16 663/19 665/2 666/4 676/2 678/2 678/4 678/5 679/22 686/9 687/13 689/17</p> <p>embarrassing [2] 550/8 550/19</p> <p>embrace [1] 622/4</p> <p>emergency [2] 715/18 715/25</p> <p>emesis [1] 693/9</p> <p>emotional [4] 511/6 585/14 705/1 715/15</p> <p>employability [4] 731/1 736/18 737/3 738/18</p> <p>employed [1] 600/23</p> <p>employee [8] 519/17 621/17 622/6 637/2 637/2 638/1 644/23 688/21</p> <p>employees [14] 512/15 529/22 548/10 620/25 621/12 621/25 622/9 622/14 622/18 622/22 623/6 626/20 634/17 715/16</p> <p>employer [3] 707/19 740/23 740/24</p> <p>employers [12] 708/5 735/24 738/1 740/17 741/2 751/10 751/19 753/1 753/6 753/16 753/18 753/20</p> <p>employment [17] 507/3 509/15 584/18 600/20 600/22 600/24 704/16 704/23 707/13 707/15 730/15 732/19 733/16 735/12 739/20 749/13 749/15</p>
<p>E</p> <p>each [14] 513/14 514/3 520/24 621/17 641/4 687/1 699/21 719/9 720/20 723/17 723/21 726/17 726/17 726/22</p> <p>earlier [15] 583/21 591/21 611/10 645/6 649/25 660/8 663/7 667/16 667/18 668/11 672/3 684/21 685/7 710/25 715/15</p> <p>early [17] 576/10 582/4 582/4 593/7 593/25 602/20 602/22 663/7 663/13 679/16 699/9 702/1 715/18 720/21 726/6 734/25 741/4</p> <p>earn [2] 734/7 747/10</p> <p>earning [2] 731/1 739/2</p> <p>earnings [1] 737/25</p> <p>earns [1] 739/3</p> <p>ease [1] 687/1</p> <p>easier [1] 511/9</p> <p>Eastern [1] 732/10</p> <p>easy [2] 510/18 510/20</p> <p>eat [1] 720/21</p> <p>Economic [2] 736/3 747/5</p> <p>economist [3] 510/11 740/12 750/14</p> <p>economist's [3] 739/14 741/18 749/16</p> <p>Edelman [6] 510/10 511/1 754/12 755/8 755/25 756/14</p> <p>education [3] 734/9 735/22 744/18</p> <p>educational [4] 730/23 731/2 731/3 733/19</p> <p>effect [5] 515/7 572/14 676/6 678/24 717/3</p> <p>effects [1] 574/18</p> <p>efforts [4] 733/8 733/9 734/2 739/15</p> <p>eight [3] 620/19 685/25 732/6</p> <p>either [9] 531/22 544/12 587/3 594/12 596/18 600/25 659/23 660/9 714/12</p> <p>electronic [1] 666/10</p> <p>element [1] 620/25</p> <p>elements [2] 620/20 620/22</p> <p>eleven [1] 649/6</p> <p>elicit [1] 520/4</p> <p>elicited [1] 641/17</p> <p>eliminated [1] 743/4</p> <p>else [25] 521/25 539/24 544/18 551/15 559/4 564/23 576/11 576/16 584/22 586/25 587/11 590/18 591/2 591/22 598/2 598/2 607/14 632/3 682/22 682/25 686/6 698/13 703/25 744/6 754/17</p> <p>elsewhere [1] 726/4</p> <p>email [80] 526/22 540/19 540/23 542/21 542/23 543/13 543/19 543/20 543/22 543/23 545/24 546/2 553/15 555/18 567/3 570/13 571/9 572/24 572/25 573/11 574/10 581/4 581/7 581/9</p>	<p>encouraged [2] 622/4 633/20</p> <p>encouragement [1] 630/25</p> <p>encouraging [3] 610/13 627/16 667/9</p> <p>end [29] 514/8 521/10 523/2 528/11 536/10 542/13 545/12 547/18 547/20 549/16 559/24 568/2 572/10 573/25 574/1 577/11 595/7 612/20 615/3 653/7 668/2 676/11 700/15 701/2 702/1 703/4 703/12 705/3 706/2</p> <p>ended [6] 542/14 550/6 553/6 553/12 569/10 573/6</p> <p>energy [5] 725/25 726/1 726/2 728/22 729/2</p> <p>enforced [4] 513/5 513/23 520/15 626/25</p> <p>enforcement [1] 625/7</p> <p>enforces [2] 622/12 624/3</p> <p>engage [6] 532/2 627/17 644/2 656/20 657/24 658/22</p> <p>engaged [2] 721/1 725/16</p> <p>engagement [31] 559/9 578/22 582/7 612/9 612/9 612/11 612/16 612/22 612/23 613/10 613/17 614/8 614/12 614/19 615/7 617/9 650/18 650/21 650/24 651/6 654/11 654/13 654/15 654/19 671/22 671/23 672/1 676/8 681/10 690/3 717/5</p> <p>engagements [1] 579/5</p> <p>engaging [9] 656/18 658/18 659/13 659/14 667/25 703/2 725/17 725/20 726/22</p> <p>enjoy [1] 538/24</p> <p>enjoyed [2] 699/24 737/21</p> <p>enough [3] 520/17 645/17 674/5</p> <p>ensure [4] 614/24 621/5 621/20 659/4</p> <p>enter [1] 511/3</p> <p>entered [5] 526/5 526/6 526/10 526/25 527/16</p> <p>entire [4] 584/18 593/2 710/24 723/23</p> <p>entirely [2] 625/8 749/5</p> <p>entitled [4] 515/16 522/13 522/14 757/5</p> <p>EPP [2] 688/20 703/21</p> <p>equal [1] 612/25</p> <p>equitable [1] 627/23</p> <p>era [1] 609/25</p> <p>error [1] 553/15</p> <p>escalating [2] 706/13 707/8</p> <p>especially [1] 626/14</p> <p>essence [3] 509/14 509/20 621/3</p> <p>essential [1] 680/1</p> <p>essentially [3] 529/11 630/17 630/18</p> <p>establishes [1] 624/7</p> <p>estimate [1] 748/5</p> <p>estimated [4] 734/6 746/13 749/21 750/2</p> <p>estimates [1] 746/12</p>

<p>E</p> <p>et [2] 660/23 660/23</p> <p>et cetera [2] 660/23 660/23</p> <p>ethical [1] 563/14</p> <p>ethics [16] 563/18 563/19 563/21 564/7 565/4 565/6 565/20 567/22 634/25 635/1 673/11 706/21 706/22 706/23 707/2 707/5</p> <p>EthicsPoint [2] 607/21 608/4</p> <p>evaluate [1] 733/9</p> <p>even [32] 524/23 525/1 528/12 530/3 530/5 543/5 544/14 545/4 560/5 561/22 564/15 566/13 567/10 574/9 578/24 590/16 592/3 594/14 607/2 609/9 611/10 621/1 634/17 653/7 654/23 663/15 673/7 673/10 675/4 707/24 708/23 710/23</p> <p>evening [4] 523/8 531/17 538/18 754/16</p> <p>event [2] 602/18 674/6</p> <p>events [1] 574/18</p> <p>eventually [1] 584/7</p> <p>ever [30] 565/19 565/22 566/11 613/12 661/25 662/6 662/11 662/15 662/23 677/15 677/18 677/24 678/8 678/25 679/4 700/1 700/3 701/6 701/16 715/7 715/25 721/11 721/11 722/2 726/15 727/4 727/18 727/18 732/12 732/16</p> <p>every [16] 528/11 563/22 577/7 577/10 586/10 586/13 596/12 621/24 622/5 665/7 700/22 705/18 719/6 719/6 720/15 725/8</p> <p>every day [1] 528/11</p> <p>every-other-week [1] 577/7</p> <p>everybody [10] 593/4 593/14 593/22 594/7 597/17 668/3 681/24 686/6 724/13 724/13</p> <p>everybody's [1] 528/13</p> <p>everyone [4] 531/19 594/9 627/21 714/23</p> <p>everything [32] 510/22 519/20 524/22 536/15 536/16 539/2 539/22 549/7 560/12 576/21 576/23 578/16 582/6 587/10 590/6 590/11 590/22 590/24 598/20 646/10 646/22 652/6 664/14 682/25 683/20 687/9 706/2 707/8 719/15 724/8 725/13 727/20</p> <p>evidence [52] 510/8 510/9 511/3 515/1 518/14 518/20 519/6 519/9 519/19 519/21 519/21 520/4 523/3 524/3 524/14 524/21 524/23 525/19 525/20 525/25 526/3 526/5 526/9 526/9 526/15 526/15 527/2 527/7 527/14 527/17 528/3 528/21 528/25 529/1 529/2 529/3 529/3 529/5 530/11 531/1 532/18 532/21 533/20 534/5 535/20 536/12 536/13 641/16 646/19 727/6 727/8 746/4</p> <p>exacerbation [9] 552/12 553/8 556/12 556/21 557/22 570/2 571/15 670/6 670/10</p> <p>exacerbations [1] 573/19</p> <p>exact [11] 514/18 598/14 626/5 626/7 631/20 633/10 635/6 636/4 676/4 724/17 724/20</p> <p>exactly [4] 531/10 580/22 625/24 640/20</p> <p>exam [3] 693/17 731/8 731/10</p> <p>exam-based [1] 731/10</p> <p>examination [24] 538/4 602/1 619/5 643/1 648/21 649/21 649/24 649/25 651/4 663/20 669/11 691/20 695/14 699/1 713/1 717/1 718/12 723/4 728/16 728/17 730/1 740/8 752/8 754/1</p> <p>examinations [1] 755/11</p> <p>examine [1] 521/8</p> <p>example [6] 510/19 519/6 519/7 524/5 533/19 615/17</p> <p>exceedingly [1] 618/7</p> <p>excelled [3] 724/8 724/8 727/20</p> <p>excellent [3] 734/11 736/10 737/10</p> <p>except [2] 616/11 685/21</p> <p>exception [2] 536/4 616/8</p> <p>exchanged [1] 624/14</p> <p>excited [6] 540/4 540/4 540/6 577/25 658/21 724/22</p> <p>excitement [2] 538/11 548/3</p> <p>exclamation [2] 604/12 605/2</p> <p>exclude [1] 519/20</p> <p>excluded [4] 518/14 518/20 529/18 530/25</p> <p>excuse [6] 513/4 541/9 567/2 652/2 668/25 690/8</p> <p>excused [8] 646/1 698/9 702/8 702/11 717/22 722/13 729/7 754/8</p> <p>executive [3] 742/24 746/10 750/23</p> <p>exercise [1] 618/12</p> <p>exercising [1] 620/11</p> <p>exhibit [78] 511/13 516/10 523/6 523/19 523/21 523/25 527/22 528/17 529/16 531/16 532/3 532/9 532/20 532/23 533/17 533/22 536/4 545/22 545/23 554/14 554/15 564/2 568/21</p>	<p>570/12 571/7 572/23 575/12 581/1 591/15 594/21 598/23 603/7 603/12 603/22 603/24 608/8 608/8 611/14 614/16 615/20 625/9 630/11 635/8 636/25 640/9 641/15 641/24 642/21 643/8 649/23 651/2 651/3 657/24 658/12 658/12 659/10 665/1 672/20 672/20 674/12 675/10 680/5 684/20 684/22 686/19 687/25 689/21 692/10 694/14 695/2 695/6 695/13 695/20 695/24 703/22 703/22 754/24 754/25</p> <p>Exhibit 128 [3] 528/17 531/16 532/20</p> <p>Exhibit 533 [1] 603/7</p> <p>Exhibit 67 [1] 643/8</p> <p>Exhibit 91 [1] 680/5</p> <p>exhibits [30] 512/1 523/17 523/18 524/2 525/1 525/6 525/10 525/18 525/22 526/7 526/14 526/20 526/24 527/14 527/22 528/3 528/23 528/24 532/17 533/10 533/18 534/6 535/23 535/25 536/2 646/2 646/6 646/8 646/12 646/18</p> <p>exist [2] 529/13 745/18</p> <p>expand [5] 552/21 572/14 635/20 670/19 685/2</p> <p>expanding [2] 552/23 573/13</p> <p>expansion [1] 560/8</p> <p>expect [3] 515/17 522/25 739/20</p> <p>expectation [2] 614/7 703/20</p> <p>expectations [6] 611/13 629/22 629/23 668/24 669/8 704/15</p> <p>expected [4] 511/18 618/17 675/17 727/19</p> <p>expecting [2] 597/25 597/25</p> <p>expects [1] 620/25</p> <p>expense [2] 598/6 629/11</p> <p>expenses [1] 704/13</p> <p>expensive [1] 679/19</p> <p>experience [19] 516/7 565/1 696/11 726/8 727/19 734/10 735/22 738/24 744/18 747/15 747/19 747/25 748/4 748/5 748/12 748/18 748/25 749/12 751/1</p> <p>experienced [1] 560/9</p> <p>experiencing [1] 705/6</p> <p>expert [20] 534/2 648/16 691/3 691/7 691/10 708/8 708/11 708/12 730/9 730/17 730/20 732/3 732/14 732/16 734/14 735/6 739/24 746/25 752/15 753/15</p> <p>expertise [1] 739/22</p> <p>Experts [1] 731/9</p> <p>explain [9] 516/4 516/11 516/19 556/16 573/1 708/1 719/24 730/8 750/4</p> <p>explained [2] 540/10 666/3</p> <p>explore [1] 521/11</p> <p>exposure [1] 584/21</p> <p>expressed [2] 689/10 740/1</p> <p>extent [3] 510/16 521/11 562/7</p> <p>extenuating [1] 533/12</p> <p>extra [1] 592/18</p> <p>extremely [4] 524/5 560/9 565/2 574/14</p> <p>eyes [3] 549/2 549/9 631/6</p>
	<p>F</p> <p>face [5] 520/21 532/17 721/8 725/12 725/12</p> <p>face-to-face [1] 725/12</p> <p>facing [1] 706/1</p> <p>fact [34] 509/16 509/17 509/23 520/18 522/10 527/9 530/4 530/6 532/22 538/14 550/7 586/2 586/3 610/16 617/21 620/24 627/14 627/15 628/16 628/16 628/23 628/23 639/18 653/2 654/19 662/22 675/19 682/10 683/17 686/14 706/10 708/9 731/20 741/4</p> <p>factors [2] 734/8 734/24</p> <p>facts [9] 626/9 627/21 645/14 656/23 656/25 657/1 657/1 657/7 657/13</p> <p>factual [2] 623/21 732/21</p> <p>fade [1] 534/3</p> <p>fair [3] 627/21 627/23 755/15</p> <p>fairly [7] 567/1 580/3 597/2 627/10 668/7 668/8 748/15</p> <p>faith [2] 527/10 622/19</p> <p>fake [1] 522/13</p> <p>fall [3] 618/5 624/5 646/15</p> <p>fallen [1] 723/16</p> <p>falls [1] 621/18</p> <p>falsely [1] 741/2</p> <p>familiar [3] 582/9 620/6 620/9</p>

F	
<p>families [2] 550/16 719/5</p> <p>family [12] 550/15 566/6 566/7 566/20 584/24 599/18 600/7 600/7 600/16 674/6 691/24 719/14</p> <p>famous [1] 602/11</p> <p>FAQ [1] 611/19</p> <p>far [3] 662/10 662/19 738/14</p> <p>fast [4] 547/10 635/4 698/17 724/1</p> <p>fast-forward [1] 635/4</p> <p>fault [1] 554/2</p> <p>favorite [3] 538/15 566/6 604/9</p> <p>FCRR [2] 507/21 757/9</p> <p>FCRs [3] 616/1 616/4 616/6</p> <p>fear [1] 622/14</p> <p>February [27] 530/1 530/3 576/10 576/11 576/25 577/1 577/5 577/6 578/2 635/4 635/5 635/7 675/6 680/10 680/12 683/17 683/22 684/23 712/9 712/9 733/13 733/14 737/11 739/9 739/10 746/13 752/12</p> <p>February 18th [1] 680/12</p> <p>February 2019 [2] 683/17 683/22</p> <p>February 5th [4] 576/25 635/4 635/5 684/23</p> <p>federal [6] 576/3 618/4 618/14 732/8 732/9 732/9</p> <p>feedback [7] 516/8 516/9 516/12 516/13 517/14 733/10 734/5</p> <p>feel [7] 542/24 543/15 604/16 645/14 647/3 716/16 725/21</p> <p>feeling [13] 540/3 554/8 554/9 562/10 565/4 569/7 575/21 590/13 597/13 599/16 600/13 636/10 673/17</p> <p>feels [7] 517/13 564/22 599/22 599/23 677/10 703/17 703/18</p> <p>fell [2] 572/20 726/7</p> <p>felt [7] 522/1 584/4 604/19 609/9 682/9 702/23 724/23</p> <p>few [15] 518/11 561/23 565/17 569/19 643/12 643/15 643/23 665/6 665/7 668/11 675/25 696/4 699/12 723/19 752/7</p> <p>field [83] 517/8 519/10 543/14 560/14 560/19 560/21 577/22 578/20 578/22 580/17 582/6 582/17 582/18 582/18 583/1 587/1 587/22 592/16 595/5 595/6 611/24 612/2 612/12 612/17 613/6 616/1 616/5 616/10 616/11 616/20 617/5 629/7 629/16 629/21 650/14 653/20 654/5 654/10 654/12 654/16 654/20 654/22 654/23 655/4 675/8 675/17 676/15 676/18 676/20 676/22 677/5 677/10 677/14 677/16 677/19 677/24 678/2 678/5 678/9 678/13 678/15 678/25 679/5 680/2 681/12 684/13 684/17 687/16 687/17 688/24 689/2 689/11 703/13 704/10 704/11 704/12 704/13 712/20 714/21 715/1 732/25 746/25 747/1</p> <p>Fifth [1] 507/12</p> <p>figure [5] 510/11 532/10 563/11 587/2 647/3</p> <p>figured [3] 597/14 700/17 708/1</p> <p>file [4] 525/7 566/2 704/7 749/20</p> <p>filed [11] 563/19 565/19 565/24 566/4 673/11 673/16 684/23 707/5 707/7 751/20 753/19</p> <p>filing [1] 751/16</p> <p>fill [4] 629/15 654/9 707/13 755/19</p> <p>filled [1] 654/22</p> <p>filling [2] 629/9 629/19</p> <p>final [5] 519/19 521/14 589/22 598/6 704/20</p> <p>finally [3] 516/21 601/10 716/16</p> <p>financial [1] 660/22</p> <p>find [11] 510/16 522/21 522/23 529/2 552/15 552/16 600/22 639/11 701/20 709/12 721/11</p> <p>finds [1] 510/19</p> <p>fine [4] 560/7 649/10 690/10 756/2</p> <p>finish [2] 563/24 649/8</p> <p>finished [6] 509/6 572/19 647/5 648/25 698/14 702/20</p> <p>fire [2] 636/23 637/24</p> <p>fired [7] 624/18 624/22 626/4 707/18 707/21 741/3 741/5</p> <p>firing [6] 625/5 625/23 626/24 638/8 638/13 638/21</p> <p>first [72] 511/16 517/24 520/3 520/6 521/8 522/23 526/19 527/3 532/16 537/12 540/8 549/16 551/18 552/12 556/12 556/21 557/14 557/22 560/17 561/8 566/9 566/11 567/8 568/17 570/21 571/15 574/12 575/16 576/18 576/18 578/3 582/15 590/2 595/4 595/14 597/4 597/18 599/11 604/18 608/5 620/11 630/13 634/11 643/14 643/25 644/4 645/9 645/13 651/7 652/12 658/25 659/11 670/6 670/10 674/11 674/13 684/15 684/20 688/23 696/13 704/15 704/19 705/6 713/12 720/1 730/10 730/21 737/10 741/14 749/24 752/12 755/25</p>	<p>first-hand [1] 520/6</p> <p>fit [1] 720/12</p> <p>five [14] 522/24 533/1 593/7 608/3 647/12 650/11 719/3 719/3 730/13 733/12 733/13 747/19 749/2 750/20</p> <p>five-minute [1] 647/12</p> <p>fives [1] 580/19</p> <p>fix [1] 577/24</p> <p>flex [1] 713/22</p> <p>flex-time [1] 713/22</p> <p>flexible [1] 756/11</p> <p>flight [1] 648/16</p> <p>flights [2] 679/10 679/13</p> <p>floating [1] 565/10</p> <p>floor [2] 720/19 723/14</p> <p>fly [1] 679/11</p> <p>FMLA [11] 585/11 585/13 585/20 586/6 586/21 587/13 587/14 587/24 588/23 592/13 595/13</p> <p>focus [11] 551/23 551/25 567/19 595/13 601/19 682/21 683/4 683/8 683/14 696/1 727/17</p> <p>focused [2] 684/12 737/12</p> <p>focuses [1] 703/2</p> <p>focusing [1] 703/16</p> <p>folks [5] 513/7 522/11 647/3 756/9 756/11</p> <p>follow [7] 590/5 592/6 595/23 694/17 698/2 735/13 752/19</p> <p>follow-up [4] 694/17 698/2 735/13 752/19</p> <p>followed [3] 621/20 636/14 704/16</p> <p>following [10] 528/24 529/21 546/10 547/23 583/10 610/7 614/13 659/5 697/1 714/13</p> <p>force [3] 717/9 742/19 742/23</p> <p>forefront [1] 721/2</p> <p>foregoing [1] 757/3</p> <p>forget [4] 590/19 590/22 590/24 598/19</p> <p>forgot [2] 606/5 649/6</p> <p>forgotten [1] 668/3</p> <p>form [5] 510/9 510/14 511/5 666/10 687/18</p> <p>formal [1] 572/7</p> <p>formerly [1] 512/16</p> <p>forms [11] 560/14 560/19 560/21 578/22 580/14 580/17 580/25 629/9 629/16 629/16 629/19</p> <p>formula [1] 749/10</p> <p>forth [5] 532/2 580/3 627/3 634/12 726/16</p> <p>forward [11] 518/10 531/3 533/11 536/23 547/10 548/10 614/25 635/4 665/10 718/5 729/16</p> <p>forwarded [1] 665/20</p> <p>found [3] 567/12 626/17 751/23</p> <p>foundation [4] 524/12 525/11 529/15 646/18</p> <p>four [20] 517/19 517/20 517/24 519/5 581/22 581/23 581/24 583/21 584/3 593/3 627/11 639/2 639/5 663/10 699/16 732/6 733/14 747/15 748/25 749/3</p> <p>four o'clock [1] 593/3</p> <p>fourth [2] 561/11 643/13</p> <p>fragile [1] 574/24</p> <p>frame [18] 546/12 549/15 566/2 577/4 582/4 585/21 592/12 595/10 596/1 596/11 596/15 626/2 669/2 694/25 700/5 711/9 715/18 740/22</p> <p>frankly [4] 513/6 527/10 532/2 755/1</p> <p>frequently [2] 699/13 700/23</p> <p>fresh [1] 659/20</p> <p>freshman [1] 723/13</p> <p>Friday [2] 618/12 629/10</p> <p>Fridays [1] 577/8</p> <p>friend [6] 705/2 724/6 724/10 724/14 728/2 737/1</p> <p>friends [8] 511/19 719/12 723/14 724/1 725/7 725/11 725/18 728/6</p> <p>friendship [1] 723/22</p> <p>friendships [1] 723/18</p> <p>front [12] 509/15 509/20 510/2 510/8 510/12 510/17 511/5 603/8 611/14 611/24 685/12 692/12</p> <p>frustrated [1] 576/21</p> <p>frustrating [1] 649/7</p> <p>frustration [1] 584/15</p> <p>full [12] 510/11 511/1 517/9 601/6 692/18 713/22 713/23 722/25 736/21 736/21 739/4 748/11</p>

F	709/16 709/20 715/16 715/18 723/1 723/18 723/18 726/2 726/6 734/23 736/7 736/21 752/10 756/4 756/7 756/11
full-time [6] 601/6 713/22 713/23 736/21 736/21 739/4	Goal [1] 576/17
fully [3] 623/20 704/9 704/14	Goal-wise [1] 576/17
fun [13] 514/25 538/13 538/19 538/23 550/15 550/17 567/18 656/23 656/25 657/1 657/1 657/7 657/13	goals [1] 576/15
function [3] 566/17 585/18 644/24	God [1] 549/21
functions [1] 641/9	goes [21] 509/18 516/16 519/19 531/7 544/18 545/11 546/22 550/14 552/15 578/12 666/13 667/18 672/25 673/1 675/21 677/6 687/4 696/11 702/23 717/9 717/9
funny [2] 605/24 726/16	going [199] 511/20 513/4 513/7 513/11 513/20 516/7 516/10 516/14 517/11 518/21 519/21 520/6 520/12 520/12 520/14 520/16 521/9 522/5 522/8 522/12 522/20 523/2 523/3 523/15 523/22 523/24 524/12 524/14 524/21 524/24 527/18 530/8 530/15 530/22 531/3 531/10 536/15 538/21 539/11 539/14 540/1 545/16 546/16 546/19 547/1 548/2 548/10 550/21 551/21 554/13 555/22 555/24 555/25 556/6 556/7 556/14 557/16 558/3 558/11 558/17 558/23 558/24 558/25 559/7 561/2 562/12 562/13 562/20 563/8 563/15 563/17 566/5 566/21 566/23 567/3 567/16 567/18 568/5 569/10 569/11 569/13 569/16 569/16 570/5 570/6 570/7 572/4 572/4 572/8 572/15 573/13 574/10 576/14 576/24 577/9 577/12 577/13 577/17 577/19 577/21 577/25 578/10 578/14 578/16 578/18 580/16 583/12 583/16 583/25 584/1 584/23 584/25 585/5 585/6 585/6 585/7 585/9 585/9 586/8 586/9 586/11 586/11 586/16 588/15 589/17 589/25 590/6 593/3 593/11 593/14 593/15 593/16 593/17 593/20 593/21 593/23 594/1 594/10 596/13 597/15 598/6 599/17 600/17 603/8 604/14 611/2 611/12 614/24 618/11 631/19 636/23 637/24 647/2 648/17 649/12 654/1 654/2 656/18 657/23 664/15 664/21 665/1 671/15 672/20 673/19 676/12 677/14 679/11 679/16 680/5 680/8 680/14 686/1 686/10 686/18 687/5 687/21 687/23 689/8 689/19 690/15 708/8 709/21 709/23 709/23 710/10 713/8 713/9 716/9 721/3 721/9 723/12 726/19 727/7 741/8 743/25 745/5 751/22 756/10
further [15] 601/23 645/23 679/10 695/11 698/3 702/5 712/21 716/21 717/20 721/10 722/8 728/14 729/6 752/4 753/23	golden [1] 652/4
future [8] 591/5 591/5 734/7 736/18 737/3 738/4 738/18 753/20	gone [5] 521/22 680/5 685/20 689/17 715/25
G	good [48] 509/4 511/10 520/17 527/9 531/22 537/11 537/21 537/22 538/6 549/21 554/12 560/20 567/6 567/7 569/17 572/21 576/18 577/16 577/16 577/17 584/16 584/23 591/22 592/2 617/11 622/19 643/3 652/23 657/3 665/12 667/13 668/6 671/25 680/19 680/24 691/22 695/16 699/3 705/20 718/14 723/6 724/23 728/19 730/3 735/24 738/1 740/10 740/11
G-I-B-B [1] 718/11	Google [11] 552/16 552/16 553/4 553/7 553/9 556/19 557/22 632/8 633/2 633/12 633/14
game [5] 700/1 700/9 700/23 700/25 701/25	Googles [1] 753/12
games [17] 699/14 699/18 699/20 699/23 699/24 700/6 700/17 700/18 700/20 700/21 701/1 701/2 701/7 701/12 701/13 701/14 701/15	Googling [4] 552/17 557/23 633/7 633/8
gamut [1] 637/20	Gosh [1] 543/8
Gardens [1] 541/7	got [54] 544/8 544/8 547/8 549/21 554/22 561/23 563/23 566/8 566/19 566/22 567/6 567/17 572/15 574/23 574/24 580/18 580/19 580/23 588/4 592/17 593/4 593/11 600/17 600/17 601/15 601/17 607/14 607/18 608/4 611/5 631/16 646/5 648/16 649/10 650/20 650/23 659/12 659/12 668/2 681/4 686/17 693/22 714/1 714/3 714/8 714/9 719/7 724/16 725/10 733/10 734/5 737/17 755/13 755/21
gave [18] 536/9 544/13 546/15 550/19 551/2 581/25 584/17 595/3 602/8 661/9 662/11 662/15 662/19 662/23 668/25 669/2 669/5 748/24	got a [1] 544/8
GCI [2] 630/19 632/23	gotten [7] 516/9 517/13 579/25 594/2 743/24 744/24 745/2
gears [1] 743/12	government [1] 731/6
geez [2] 552/18 575/5	grabbed [1] 567/11
general [1] 744/21	gracious [1] 550/11
generally [6] 520/10 539/5 564/6 568/12 641/2 700/9	grant [1] 532/8
Genie [6] 519/7 519/10 519/12 605/16 608/19 686/22	Gray [2] 597/2 712/13
Genie Hamilton's [1] 519/12	great [18] 509/5 543/15 544/4 544/8 560/20 569/15 577/16 577/17 579/22 582/10 582/11 584/20 595/8 604/8 658/22 724/14 724/14 736/12
gentlemen [4] 512/12 618/2 690/19 691/9	greatest [1] 561/7
geography [1] 514/17	green [5] 527/15 534/6 646/10 646/18 646/22
get [101] 509/5 513/13 527/4 529/3 529/23 532/7 533/14 536/22 538/9 544/10 553/17 555/11 558/20 561/24 562/3 562/15 564/19 566/1 566/2 567/3 567/16 569/11 569/16 577/21 577/22 578/1 578/2 580/25 583/17 583/18 584/1 584/7 584/20 587/24 588/15 592/8 592/9 594/4 595/8 595/13 597/4 598/11 598/11 603/8 605/17 605/25 611/2 613/25 618/2 630/20 636/3 645/16 645/17 648/5 648/9 648/16 648/18 648/25 649/8 649/9 652/15 659/7 659/14 659/16 666/20 666/22 668/10 671/18 673/19 675/10 684/25 685/1 686/9 688/6 690/13 698/4 702/21 708/1 708/21 709/15 715/23 719/2 720/15 725/8 728/6 736/21 738/6 738/10 738/13 738/15 739/4 745/5 748/19 748/23 749/22 750/8 753/3 755/16 755/25 756/1 756/5	Grey [22] 543/10 543/23 544/15 545/25 546/3 570/13 570/25 591/18 591/23 591/23 591/25 592/5 663/20 663/25 664/7 665/21 665/24 666/11 666/22 674/14 674/18 675/2
gets [2] 533/22 750/2	Griffith [11] 512/14 512/16 515/6 515/6 515/13 515/18 519/25 551/16 608/11 608/25 711/21
getting [31] 514/12 556/11 557/21 558/25 561/15 562/6 562/14 562/19 565/15 565/16 568/2 569/17 570/20 578/25 579/15 584/16 584/20 584/21 597/12 598/4 607/11 607/15 618/15 633/8 640/22 694/12 701/12 701/15 709/9 710/2 712/1	groomed [1] 743/25
Gibb [6] 508/8 718/1 718/2 718/5 718/11 718/16	group [14] 507/3 612/6 662/23 719/2 719/3 719/7 721/6 724/11 724/12 725/7 725/17 726/15 726/16 732/19
Gibbs [1] 511/20	
girl [1] 725/18	
girls' [7] 719/4 720/5 720/8 720/25 721/4 725/6 726/10	
give [20] 509/24 510/11 511/11 523/8 532/25 536/10 598/8 605/11 617/20 627/7 627/9 645/16 656/12 683/7 683/11 683/13 684/17 722/18 741/8 751/22	
given [10] 517/7 609/14 616/14 618/9 661/11 677/21 683/17 683/22 683/25 748/11	
gives [1] 667/20	
giving [6] 516/11 550/23 552/18 555/8 651/19 726/18	
glancing [1] 549/8	
global [2] 630/19 631/2	
go [101] 510/4 510/8 515/5 515/22 517/3 521/25 528/11 529/22 529/23 529/25 532/7 533/18 536/15 537/9 537/13 537/16 538/17 539/7 545/16 546/24 550/18 551/4 553/4 558/2 561/23 562/11 563/8 563/17 564/6 565/9 566/21 566/23 569/17 572/15 580/3 580/3 584/22 585/11 585/13 585/20 586/1 587/2 590/1 591/6 591/8 591/11 591/13 597/22 603/21 616/20 617/4 618/13 625/21 629/11 632/19 635/15 636/7 643/12 646/5 649/12 653/17 657/2 659/10 664/2 665/1 665/3 668/12 669/10 672/23 674/12 674/17 676/22 678/23 685/1 686/1 686/20 687/21 687/23 689/19 701/9 702/12 702/13 703/22 707/9 709/16	

G	576/24 579/10 579/11 583/3 595/6 595/24 601/15 601/15 611/19 623/22 624/5 640/15 641/17 648/1 648/16 661/2 661/6 664/15 686/23 687/9 688/18 690/16 692/23 693/10 715/10 719/25 720/12 722/1 723/22 724/5 724/7 724/8 724/9 724/11 724/18 727/20 728/3 728/7 728/9 735/18 736/10 736/22 736/23 737/8 737/9 737/9 738/14 738/23 739/3 739/5 748/21 748/23 750/4 750/7 753/19 754/24
guarding [1] 583/22	hasn't [5] 570/8 570/10 573/5 728/4 736/23
guess [17] 512/3 525/5 547/7 548/17 555/11 556/16 563/18 573/15 574/8 576/18 587/9 606/7 708/16 713/16 713/24 755/19 756/3	hate [1] 647/19
guesses [1] 605/11	Hatfield [1] 618/16
guidance [4] 622/10 629/21 666/17 667/23	have [299]
guideline [1] 579/22	haven't [11] 519/10 525/2 542/21 542/23 543/3 561/22 594/2 598/25 630/15 720/20 748/21
guidelines [2] 576/2 636/14	having [15] 543/16 586/14 587/20 591/9 595/10 604/8 658/22 676/9 687/15 705/13 706/10 706/17 707/4 714/4 717/15
Guiding [1] 660/3	HCP [1] 666/9
gun [1] 531/9	HCPs [2] 666/14 667/19
gut [1] 547/3	he [61] 509/23 510/11 510/12 515/8 515/8 515/9 515/14 515/19 515/19 515/20 515/20 515/25 516/1 516/2 516/4 516/7 516/9 516/10 516/22 516/24 517/6 517/7 517/13 517/13 525/23 525/23 525/24 526/3 529/9 531/11 531/12 534/2 551/16 565/4 567/8 567/11 567/14 573/4 573/15 573/16 592/8 592/9 594/5 594/7 599/19 608/13 608/15 609/6 609/12 609/14 630/19 631/14 648/16 648/16 711/21 711/21 711/22 713/25 714/1 714/1 734/15
guys [2] 559/14 690/17	he's [1] 515/19
H	he/she [1] 565/4
had [225] 514/16 514/17 515/25 516/24 517/11 520/9 520/22 521/7 521/12 522/7 523/5 523/13 525/23 530/5 530/8 530/17 538/19 539/7 539/18 539/21 540/1 540/19 540/23 541/5 541/22 542/19 543/23 543/24 543/25 544/1 544/3 544/15 545/9 546/7 546/12 546/15 548/15 549/12 549/17 549/18 549/19 552/13 553/18 556/18 558/7 560/2 560/8 560/11 561/7 562/1 562/14 562/22 563/10 563/13 565/13 565/13 565/24 566/11 566/12 566/14 568/16 569/13 570/21 571/5 573/2 573/3 573/12 573/24 574/7 574/9 574/9 576/6 576/25 577/20 578/15 578/17 578/17 580/1 580/2 580/13 580/24 581/21 581/21 582/4 585/25 586/10 586/12 587/9 587/17 588/1 588/6 589/18 590/17 591/4 591/11 591/12 591/21 592/23 596/15 600/9 606/14 607/20 609/6 611/1 611/10 613/5 613/16 615/13 616/17 617/8 624/23 626/14 626/24 627/2 628/11 629/6 629/6 629/13 633/20 634/10 639/6 639/10 639/12 639/19 641/19 642/14 644/16 650/8 651/15 651/20 653/13 655/14 655/21 655/24 656/1 656/1 656/11 660/13 664/9 667/16 668/3 668/4 668/5 668/11 668/17 669/21 670/11 672/18 673/3 673/16 673/19 674/15 674/23 675/25 676/3 676/14 676/18 676/19 677/15 680/12 681/9 681/12 681/25 683/25 684/16 685/7 685/20 685/21 685/25 686/2 686/15 687/12 687/13 687/14 687/17 688/14 689/1 692/17 701/9 701/23 702/3 705/15 705/24 705/24 706/25 707/1 707/12 707/18 707/21 707/21 711/14 711/14 712/6 712/8 713/19 713/22 714/12 715/25 717/4 720/15 724/20 725/6 725/6 730/12 734/11 734/25 735/16 736/10 736/23 736/24 737/10 737/16 738/22 742/8 742/14 744/7 744/24 746/17 747/22 747/25 748/3 748/7 748/11 749/21 752/17	head [10] 542/4 544/19 544/25 545/1 547/8 556/3 597/24 631/9 657/11 735/1
had said [1] 546/15	headcount [1] 677/6
hadn't [8] 528/12 554/10 594/16 607/21 683/17 683/22 686/9 711/22	headhunters [1] 752/18
half [11] 539/17 543/11 545/6 582/1 582/2 702/4 705/14 705/16 732/1 739/4 755/5	health [4] 574/20 576/5 612/13 723/9
halfs [1] 705/15	healthcare [8] 516/12 523/11 615/18 656/16 659/8 662/1 662/7 681/13
Hamilton [9] 512/14 512/18 514/15 515/2 515/4 515/8 519/7 519/10 519/25	hear [16] 512/6 514/8 520/12 521/2 566/25 567/1 567/22 590/13 670/14 677/18 690/23 697/9 697/10 717/7 717/11 753/3
Hamilton's [1] 519/12	heard [11] 520/7 521/22 552/13 554/11 575/8 579/21 594/3 649/1 670/11 710/9 715/15
hand [6] 520/6 537/23 618/23 691/13 722/21 729/17	hearing [2] 534/1 599/7
handbook [1] 635/2	hearsay [15] 523/21 524/7 535/24 563/3 599/20 716/5 716/8 716/11 719/18 721/14 724/24 734/12 734/14 735/5 735/7
handle [1] 688/3	heart [1] 583/22
hang [4] 545/13 553/13 562/10 720/19	heated [3] 565/15 565/16 565/18
happen [9] 546/9 546/10 576/11 576/14 584/25 589/15 594/10 596/21 601/18	heck [3] 549/24 556/11 593/20
happen with [1] 576/14	held [3] 734/10 736/5 737/18
happened [13] 542/18 545/20 551/6 570/1 570/9 570/10 573/5 573/7 587/18 594/1 596/22 601/18 726/23	hello [2] 619/7 619/8
happening [4] 566/3 621/15 626/1 627/10	help [17] 516/14 516/25 516/25 516/25 542/1 556/24 585/15 591/9 591/10 591/19 610/8 623/7 631/6 636/2 656/15 681/1 687/2 730/14
happens [1] 570/11	helped [3] 592/2 730/6 730/11
happy [11] 530/9 531/25 532/4 532/18 544/12 566/8 566/20 592/3 646/25 720/4 721/8	helpful [3] 532/12 571/2 726/9
hard [4] 537/14 692/11 693/8 693/9	helps [5] 516/5 521/4 637/21 688/19 714/6
harder [1] 748/22	her [252] 517/1 518/17 519/1 519/10 521/16 522/2 530/21 531/8 532/11 537/2 537/2 537/7 537/8 543/2 543/13 543/17 543/19 543/22 544/13 544/13 544/15 545/18 547/8 548/23 549/2 550/5 550/8 550/19 551/14 553/24 554/6 554/22 555/3 555/10 555/23 555/25 556/8 556/15 558/12 558/17 560/5 560/11 560/13 561/17 562/13 563/13 563/14 563/18 565/3 570/4 571/5 572/6 572/19 574/4 576/22 578/8 579/9 582/8 583/24 586/14 589/5 591/25 592/1 592/25 593/2 594/2 595/20 595/23 596/12 605/17 606/21 607/12 610/24 616/3 616/3 616/5 626/19 627/15 628/18 633/22 633/24 634/3 634/23 634/23 635/20 637/21 638/22 639/15 641/17 644/19 646/6 648/25 650/2 652/3 664/1 666/2 668/5 670/12 671/17 671/19 672/12 674/22 674/22 676/1 677/10 679/7 679/9 682/9 687/1 687/2 687/9 687/16 687/18 688/9 688/11 688/14 688/22 688/22 688/23 688/24 689/5 689/9 690/16 690/25 691/10 693/4 694/5 694/10 694/18 694/20 694/22 696/7 697/22 698/1 699/17 699/20 700/5 701/6 701/8 701/9 701/14 701/16 701/20 701/24 702/24 703/13 703/15 703/17 703/18 703/19 707/2 713/8 714/8 718/23 719/1 719/13 719/14 719/14 719/15 720/1 720/2 720/14 722/1 722/2 723/20 724/9 724/15 724/16 725/3 725/23 725/24 725/24 725/25 726/4 726/17 726/19 727/11 727/13 727/13
hardest [1] 722/6	
Hartman [1] 581/8	
has [89] 512/18 512/19 512/19 514/1 515/14 515/25 516/1 516/2 516/9 517/6 517/7 517/11 517/13 518/9 521/7 521/22 521/22 521/24 524/22 526/10 526/25 527/10 528/2 529/5 530/16 531/12 532/4 543/5 549/6 549/7 554/22 565/1 565/2	

H	hotel [5] 549/17 567/5 711/1 711/2 711/11
her... [73] 727/15 728/1 728/22 729/2 733/9 733/12 733/12 733/14 733/16 733/19 733/21 733/25 733/25 734/1 734/1 734/2 734/5 734/9 734/9 734/10 734/25 735/10 735/12 735/12 735/17 735/18 735/19 736/3 736/11 736/18 737/3 737/10 737/13 738/1 738/18 738/22 738/22 738/23 738/23 738/24 739/2 741/13 741/14 742/3 742/5 742/9 744/14 746/12 746/14 746/22 746/24 746/25 746/25 747/7 748/5 748/7 748/11 748/19 748/21 748/24 748/25 749/4 749/24 751/14 751/15 751/16 751/21 751/22 752/2 752/20 753/1 754/4 754/4	hotels [3] 679/19 679/19 679/23
here [62] 512/9 516/4 518/1 518/24 525/18 527/6 528/19 528/22 531/7 531/9 542/15 556/25 557/1 557/2 557/3 558/9 561/24 564/5 570/20 573/8 578/25 579/1 579/15 580/24 583/21 584/3 584/6 584/19 591/9 593/6 593/20 595/2 604/7 615/25 624/25 628/3 629/20 631/7 637/6 637/17 640/18 643/8 646/24 660/6 660/19 661/2 664/15 672/24 678/12 684/25 686/20 686/20 686/23 688/18 689/3 690/22 695/23 713/13 726/12 727/24 755/15 755/22	hotline [16] 606/17 607/14 663/5 663/10 664/3 664/11 664/21 672/9 672/15 672/17 672/21 673/2 673/8 673/16 706/7 706/11
herself [2] 634/13 750/4	hour [3] 731/24 739/3 755/5
Hey [21] 541/3 542/21 543/3 543/13 544/15 546/16 550/13 557/18 569/10 569/14 569/25 572/13 573/7 577/11 577/22 578/9 594/4 667/14 678/14 678/24 679/4	hourly [1] 731/23
Hi [2] 604/8 665/24	hours [5] 649/6 649/6 649/7 731/6 731/25
high [5] 552/14 552/14 580/3 714/3 723/10	house [5] 600/17 600/17 720/12 720/12 725/11
higher [11] 620/5 623/18 708/23 710/7 710/8 710/10 737/14 746/11 746/14 746/17 746/20	how [111] 509/11 511/16 513/13 514/2 515/11 516/4 516/15 519/8 520/8 533/21 538/6 538/12 538/13 538/21 538/25 540/3 542/13 544/2 545/2 545/15 545/19 548/2 548/9 548/14 551/19 554/7 557/4 557/16 561/18 562/10 569/7 572/6 576/14 577/6 577/24 578/10 579/13 579/25 580/4 583/7 586/1 586/3 586/17 590/13 590/14 590/15 592/13 592/21 597/5 597/12 599/16 599/21 599/23 600/12 604/13 604/16 604/18 654/6 673/25 676/11 676/21 687/4 689/18 690/13 691/25 692/2 695/17 699/6 699/10 699/13 699/23 700/23 709/5 710/2 713/11 716/9 718/19 718/23 719/1 719/11 720/23 721/4 721/9 721/9 723/11 723/15 723/24 725/14 725/18 726/13 727/17 728/1 728/2 731/25 732/5 736/1 736/5 738/8 739/8 740/22 740/24 745/14 745/17 745/23 750/4 750/6 751/10 752/10 752/25 753/1 756/9
higher-level [1] 746/20	however [10] 618/7 622/2 623/18 626/18 647/1 666/8 674/6 698/1 704/22 756/11
higher-ranking [2] 620/5 623/18	HR [18] 514/24 531/6 590/23 591/10 591/14 591/21 599/1 608/5 626/14 626/16 627/5 628/4 637/21 638/11 644/15 644/17 685/15 712/19
highest [1] 683/3	huge [1] 525/4
highly [2] 524/10 529/16	huh [10] 551/9 552/7 555/17 569/1 581/14 587/15 595/22 623/11 658/9 728/24
him [28] 515/10 515/11 515/16 516/12 516/25 517/1 517/2 517/3 517/7 517/8 526/21 531/4 567/13 573/4 573/7 573/9 573/20 597/16 599/19 609/2 609/5 609/12 609/12 609/13 609/15 612/8 631/14 713/25	human [12] 606/16 607/13 610/25 622/25 623/2 638/7 638/12 638/20 639/23 686/11 706/14 724/7
Hinson [3] 755/7 755/25 756/13	hung [1] 701/22
hint [3] 550/19 605/11 605/13	hurt [2] 558/19 601/14
HIPAA [1] 755/2	husband [10] 524/8 524/11 562/19 563/2 563/7 567/5 599/18 600/6 716/3 716/13
hire [3] 738/2 749/4 753/18	I
hired [3] 737/16 737/19 752/13	I'll [8] 513/13 517/21 523/8 605/11 643/8 695/23 696/2 756/1
his [14] 512/3 515/10 515/11 516/7 517/11 517/14 531/4 565/3 573/16 573/17 594/3 608/25 609/3 631/13	I'm [193] 522/20 522/24 523/22 525/5 525/5 527/10 527/13 530/9 532/17 534/1 535/1 536/15 541/3 541/6 543/4 543/9 544/4 544/10 545/5 545/7 545/7 546/16 546/19 547/8 549/7 549/24 550/1 550/15 550/20 551/25 552/18 552/24 553/11 553/21 554/1 554/9 555/4 555/22 555/22 555/24 555/25 556/13 556/14 557/20 558/13 558/14 558/15 558/17 559/2 559/2 559/7 559/11 560/14 562/11 562/13 562/14 562/19 563/17 564/11 566/23 567/5 567/6 569/17 569/24 570/5 570/6 570/10 572/22 573/8 573/8 575/2 575/17 578/9 578/10 578/13 578/20 578/24 579/2 579/5 579/14 579/16 580/2 580/21 580/21 582/9 582/15 583/20 583/20 583/22 584/5 584/6 584/18 584/19 584/20 584/21 585/5 585/6 585/7 585/8 585/9 585/9 590/16 591/16 592/3 592/15 592/17 592/19 593/6 593/6 593/7 593/8 593/9 593/10 593/15 593/16 593/16 593/20 593/21 593/21 593/25 594/7 594/17 595/7 596/2 596/13 596/16 598/18 598/21 599/17 600/3 600/15 600/16 601/20 605/3 605/17 606/6 606/7 610/14 613/23 617/3 619/9 619/14 620/24 623/1 628/6 637/17 643/17 643/17 645/6 646/20 646/23 648/3 648/7 648/19 649/12 657/11 657/11 657/23 658/2 661/7 663/18 674/16 686/1 687/21 690/13 694/3 694/3 694/17 695/5 695/6 695/6 695/16 695/16 695/18 697/11 697/14 706/9 708/10 708/12 709/12 709/25 710/2 710/22 716/7 721/15 724/17 734/19 743/1 743/19 751/18 753/2 755/1 755/20
his/her [1] 565/3	I've [7] 530/24 595/6 705/15 724/17 730/13 749/17 755/13
history [12] 693/6 694/6 696/20 730/23 730/24 730/24 731/3 733/17 733/19 734/9 735/12 736/10	I-V-I-E [1] 538/2
Hit [4] 602/14 604/13 604/24 605/12	Idaho [9] 547/13 650/21 656/9 656/15 669/10 670/1 713/17 714/17 725/12
hits [2] 519/19 602/14	idea [9] 543/25 544/3 575/7 577/16 609/4 668/6 675/25 678/21 679/18
ho [2] 566/16 566/16	ideas [2] 597/16 622/3
ho-ho [1] 566/16	identify [1] 624/25
hold [5] 588/11 618/12 630/15 718/2 729/14	ignored [1] 614/7
holding [2] 677/8 744/19	illegal [15] 518/2 556/1 556/8 556/9 557/7 557/25 558/3 558/14 558/19 559/3 559/13 562/12 563/14 583/23 591/12
holiday [4] 618/4 618/5 618/8 618/14	illegally [2] 575/17 685/4
holidays [2] 565/25 719/8	
home [11] 599/19 613/5 616/24 618/13 655/13 655/17 673/22 711/18 712/10 712/14 712/17	
homes [2] 541/7 710/18	
honest [1] 701/21	
Honor [74] 509/8 511/22 512/4 512/6 512/8 512/22 513/14 514/1 515/13 515/22 516/21 517/4 517/16 517/21 517/24 520/3 520/10 521/14 522/4 523/7 523/17 523/22 524/7 524/19 524/22 525/9 525/15 527/25 528/9 529/7 529/14 529/19 529/20 530/14 531/2 531/24 532/3 532/13 532/15 533/4 533/15 535/1 535/21 535/22 536/7 536/8 537/1 537/4 537/19 617/12 632/12 638/14 641/15 641/21 641/23 642/3 645/25 646/2 646/11 646/20 646/23 647/11 691/1 695/12 702/10 716/8 727/7 728/11 734/15 735/4 747/2 755/11 756/2 756/15	
Honor's [1] 529/9	
honorable [2] 506/11 684/4	
hope [7] 569/15 603/8 624/2 662/16 662/17 662/21 756/6	
hoped [1] 708/9	
hopeful [1] 589/17	
hoping [4] 601/10 708/13 736/21 739/4	
Hosford [2] 554/20 670/25	

I	inner-team [2] 714/19 714/20
illness [3] 636/3 636/6 693/6	inning [1] 750/8
illnesses [1] 694/6	insert [5] 553/1 553/14 554/25 555/2 573/15
illustrate [1] 516/15	inserts [1] 574/17
image [2] 573/1 573/11	insight [10] 555/11 571/18 659/19 659/20 660/1 660/22 661/4 662/1 662/7 703/2
imagine [3] 600/15 648/8 727/4	insights [46] 539/14 540/15 540/20 544/3 571/12 573/24 574/7 574/8 587/2 591/24 656/18 656/19 657/8 657/16 657/19 657/25 658/5 658/15 658/18 658/22 659/13 659/14 660/4 660/7 660/9 660/10 660/11 660/13 660/17 662/11 662/15 662/20 662/23 663/6 665/6 665/17 666/13 666/19 666/23 666/24 667/4 667/7 667/10 667/19 667/25 711/15
immediately [5] 523/3 532/25 597/22 683/7 683/13	insinuate [3] 575/18 636/1 636/8
impact [4] 659/7 737/3 738/18 739/2	insomnia [2] 693/4 696/15
impacted [1] 735/18	instances [1] 740/19
impairments [1] 730/14	instead [2] 576/5 633/7
impasse [1] 597/21	Institute [2] 736/4 747/6
implication [1] 529/24	instruct [1] 691/2
implications [1] 633/8	instructed [2] 677/15 677/18
imply [1] 518/18	instruction [6] 530/9 535/24 536/1 536/9 536/18 555/7
important [18] 513/6 513/12 516/23 521/3 528/7 539/3 548/7 551/22 604/8 621/24 622/1 622/5 652/18 652/20 652/21 683/6 701/14 734/11	instructions [6] 512/20 514/19 562/13 595/23 649/11 756/5
Importantly [1] 517/4	intend [1] 520/4
impracticable [1] 509/23	intended [4] 523/10 529/14 659/7 666/8
improper [5] 657/13 657/16 662/11 662/24 664/20	intends [1] 623/25
improve [6] 539/12 540/6 653/15 654/6 656/15 669/15	intense [1] 595/5
improved [1] 548/5	intent [3] 521/10 544/20 544/20
improvement [1] 562/7	interaction [3] 516/14 628/15 675/24
improving [1] 684/12	interactions [5] 516/12 520/9 615/17 675/24 714/18
in-person [5] 513/11 516/14 574/2 580/7 595/15	interest [2] 514/7 514/10
in-the-field [1] 582/18	interested [1] 627/20
inaccurate [4] 662/20 662/24 670/3 689/16	intermittent [3] 587/13 596/16 596/18
inappropriate [2] 558/20 660/21	internal [1] 666/4
Inaudible [1] 678/18	International [1] 731/11
incidents [1] 521/1	Internet [1] 751/13
inclination [1] 511/7	interpretation [1] 665/19
inclined [1] 532/8	interrupt [2] 524/18 528/8
include [3] 582/17 619/19 621/5	interrupted [1] 648/22
included [3] 573/1 573/11 751/4	intervene [5] 638/7 638/9 638/12 638/20 638/25
includes [2] 620/19 639/15	interview [13] 567/21 568/23 569/22 688/6 709/20 730/21 733/11 733/16 734/19 735/13 736/24 746/24 751/22
including [5] 536/19 624/10 685/20 704/5 742/22	interviewed [11] 514/24 549/17 566/1 566/3 568/6 570/16 584/18 733/12 733/12 733/14 749/24
income [2] 584/24 737/8	interviewer [1] 740/20
inconsistent [3] 525/17 527/8 625/6	interviewing [1] 711/7
inconsistently [1] 626/25	interviews [10] 708/4 734/11 734/25 737/10 737/17 752/17 752/18 752/19 752/21 753/3
increase [12] 517/1 552/5 574/21 595/14 635/23 681/25 682/3 682/5 685/3 714/21 744/8 745/8	introduce [4] 699/3 718/15 723/6 730/3
increased [7] 530/21 575/21 576/6 587/5 636/11 681/18 693/10	investigate [4] 632/21 632/23 632/23 644/14
independent [5] 627/3 744/17 745/3 745/7 745/10	investigated [4] 626/16 627/18 685/22 686/3
independently [2] 741/6 744/4	investigating [14] 627/15 627/19 628/1 628/1 628/7 628/8 628/11 628/17 628/18 628/24 628/25 644/17 644/18 645/15
INDEX [1] 508/1	investigation [8] 599/3 624/20 628/12 630/21 631/2 631/3 631/6 638/10
indicate [1] 533/17	investigations [4] 514/24 589/20 627/23 637/11
indicated [4] 556/23 557/3 640/18 646/12	investigator [4] 628/5 630/18 688/3 688/7
indicates [1] 532/10	investigators [3] 628/4 628/4 644/16
indicating [4] 526/5 526/8 526/25 588/14	invite [1] 568/4
indication [4] 575/18 575/21 636/10 685/4	invited [1] 577/14
indications [2] 556/10 577/23	invites [1] 586/24
individual [4] 620/4 620/5 623/18 730/21	involved [20] 517/25 518/8 518/10 522/7 527/9 531/7 544/10 628/4 628/11 630/19 630/20 644/13 644/18 644/24 645/15 666/20 666/22 668/10 669/19 682/15
individualized [1] 521/1	iPad [1] 567/1
individuals [5] 620/4 644/17 732/2 744/18 750/19	irrelevant [1] 522/3
industries [3] 747/14 747/18 749/6	is [743]
industry [17] 736/11 736/16 736/17 736/22 736/23 736/25 738/14 738/16 738/23 738/25 747/23 748/6 748/8 748/10 748/20 749/4 749/5	ish [2] 669/5 674/1
information [31] 511/17 552/17 553/3 553/18 571/4 571/5 572/3 593/18 624/19 631/24 633/5 633/6 633/15 639/4 645/18 662/20 662/24 726/19 730/25 735/20 739/5 740/15 741/1 741/7 741/9 744/2 744/4 747/5 752/2 752/3 752/23	isn't [15] 510/2 552/3 552/18 568/9 572/21 580/10 592/2 603/13 610/21 611/22 614/9 653/18 654/7 657/20 673/4
informed [4] 514/5 586/7 618/3 638/2	issue [37] 509/11 509/11 509/16 509/22 511/13 511/15 511/16 511/21 513/15 518/24 519/4 519/15 520/11 521/3 521/15 522/22 523/5 524/18 527/5 531/18 531/21 532/15 532/16 556/3 556/19 556/20 581/13 627/5 646/2 646/7 646/9 646/24 647/25 665/25 703/14 713/19 714/17
ingest [1] 601/13	
initial [3] 568/9 599/17 752/18	
initially [4] 523/10 550/22 581/21 700/5	
initiates [1] 589/12	
initiating [1] 726/14	
initiative [1] 683/1	
initiatives [1] 682/15	
injections [1] 694/12	
inner [3] 545/13 714/19 714/20	

<p>I</p> <p>issued [2] 530/2 584/7</p> <p>issues [18] 509/5 518/22 519/18 519/22 521/11 530/18 574/20 576/20 583/23 589/18 624/25 644/19 645/8 648/4 672/24 672/25 713/19 714/20</p> <p>it [768]</p> <p>it's [24] 510/23 512/22 523/21 528/7 528/25 530/1 554/2 559/3 563/15 575/7 579/14 580/10 636/5 637/21 647/24 649/2 660/6 665/7 705/22 726/16 740/21 743/5 752/2 753/15</p> <p>it.' [1] 631/25</p> <p>items [1] 511/4</p> <p>its [17] 518/10 519/3 528/17 620/9 620/11 620/25 621/25 622/6 622/18 622/20 623/25 624/3 625/7 634/17 641/8 641/10 659/7</p> <p>itself [1] 631/6</p> <p>IVIE [133] 506/3 508/4 511/19 512/17 512/18 514/15 514/16 514/19 514/25 515/1 515/9 515/15 515/17 515/24 516/2 516/8 516/22 516/24 517/5 517/12 518/1 519/14 519/17 520/8 520/8 520/9 520/11 520/13 520/17 521/2 530/16 530/19 531/7 532/11 536/23 537/20 538/2 538/6 619/9 624/18 626/3 626/11 626/14 630/2 637/7 638/3 638/8 643/21 644/8 644/21 645/4 647/10 648/14 648/21 648/25 649/8 649/12 649/19 651/4 672/24 673/4 675/24 676/7 676/14 677/10 688/22 688/24 690/1 690/11 692/4 692/6 693/2 694/2 694/15 696/5 702/12 702/13 702/23 702/24 703/2 703/12 703/14 703/16 703/19 704/21 717/25 718/19 723/11 725/2 728/20 728/25 731/14 733/11 733/24 734/20 736/13 737/20 738/4 738/8 739/6 739/19 740/15 740/25 741/2 741/20 742/8 742/22 743/9 743/13 743/16 744/2 744/7 744/10 744/12 746/4 746/8 746/15 746/19 746/23 746/25 747/7 747/10 747/22 748/11 749/14 750/3 750/12 750/24 751/7 751/10 752/10 753/3 754/4</p> <p>Ivie's [32] 511/19 515/10 516/13 516/23 518/16 518/25 520/5 520/21 521/15 625/2 625/23 644/10 644/14 644/19 648/12 695/3 733/7 735/16 736/2 736/9 737/2 738/17 739/1 739/15 741/10 741/25 742/15 743/3 748/17 753/8 753/12 754/24</p>	<p>J</p> <p>J-O-H-N-S-O-N [1] 691/18</p> <p>January [25] 549/15 564/18 566/1 568/5 568/6 568/24 569/19 570/14 571/10 571/21 572/24 573/25 574/1 603/25 606/9 668/16 668/17 673/9 674/13 674/17 674/19 713/4 713/12 713/16 733/13</p> <p>January 15th [6] 568/24 569/19 570/14 674/13 674/17 674/19</p> <p>January 17th [1] 571/21</p> <p>January 18th to [1] 572/24</p> <p>January 2018 [2] 603/25 713/4</p> <p>January 25th [1] 571/10</p> <p>Jean [1] 619/3</p> <p>Jenny [4] 508/7 698/25 699/5 705/2</p> <p>Jett [1] 604/10</p> <p>job [71] 513/1 513/24 516/17 516/19 538/23 541/25 561/24 565/3 585/5 586/5 592/14 592/14 595/8 600/18 601/3 601/6 615/16 639/23 644/7 677/4 680/2 680/17 680/21 680/25 707/10 707/16 708/4 708/14 708/20 709/3 709/10 711/8 719/14 722/1 722/3 724/16 724/21 727/5 733/7 734/2 734/5 734/10 736/3 736/4 736/21 737/10 737/15 738/10 738/15 739/4 739/15 739/24 740/20 740/21 740/25 741/25 742/9 744/11 744/11 745/1 746/22 746/25 747/11 748/23 749/22 750/3 750/8 752/16 752/20 752/21 754/4</p> <p>jobs [23] 707/12 708/25 709/12 710/11 719/5 730/11 733/10 734/10 736/5 737/7 737/9 737/12 737/13 740/17 744/20 744/21 746/8 746/10 746/14 746/16 746/21 747/6 752/10</p> <p>Johnson [11] 508/6 523/12 690/23 691/6 691/12 691/18 691/22 694/2 695/16 697/9 698/6</p> <p>Johnson's [1] 754/25</p> <p>joining [1] 619/10</p> <p>JOLIE [1] 506/11</p> <p>Joplin [1] 604/9</p> <p>Josie [1] 550/5</p> <p>JR [1] 506/4</p> <p>Judge [10] 511/10 513/25 524/2 524/3 599/21 642/20 690/16 727/21 732/24 735/6</p> <p>judges [1] 618/8</p>
	<p>Judy [5] 508/8 718/1 718/11 718/14 718/16</p> <p>juggle [1] 724/4</p> <p>July [12] 539/18 546/12 581/5 581/8 669/2 669/5 669/9 676/16 676/17 725/9 726/11 749/21</p> <p>July 2018 [1] 581/8</p> <p>July 2019 [1] 726/11</p> <p>July 27th [1] 581/5</p> <p>July-ish [1] 669/5</p> <p>jump [1] 514/2</p> <p>June [39] 506/5 509/1 525/18 528/22 532/19 539/18 546/12 560/4 560/13 580/13 582/4 582/4 596/23 597/22 615/12 615/20 616/9 618/7 618/13 624/12 624/14 625/17 626/3 626/4 636/23 637/8 637/16 638/7 638/12 638/20 640/19 643/22 676/7 688/19 703/23 704/6 704/8 732/1 733/15</p> <p>June 10th [3] 625/17 626/3 640/19</p> <p>June 11th [1] 733/15</p> <p>June 12th [1] 703/23</p> <p>June 15th [1] 732/1</p> <p>June 18th [2] 618/7 618/13</p> <p>June 2018 [3] 615/12 615/20 616/9</p> <p>June 3rd [1] 688/19</p> <p>June 4th [1] 704/6</p> <p>June 5th [2] 637/16 704/8</p> <p>June 6th [9] 596/23 597/22 626/4 636/23 637/8 638/7 638/12 638/20 643/22</p> <p>June 7th [1] 525/18</p> <p>June/July [1] 546/12</p> <p>Juneteenth [1] 618/5</p> <p>junior [1] 723/10</p> <p>juror [6] 564/3 568/22 575/13 581/2 598/24 754/23</p> <p>jurors [3] 513/1 524/5 649/18</p> <p>jury [62] 506/10 509/3 509/18 509/22 509/24 510/3 510/9 510/15 510/19 510/24 511/3 511/23 513/3 516/11 516/15 516/19 519/21 520/12 520/15 520/16 521/2 521/21 521/22 521/24 522/8 522/12 524/19 525/1 525/12 531/23 532/12 533/8 533/14 533/16 533/22 536/10 536/22 536/25 537/10 537/11 588/12 588/19 617/14 618/1 646/24 647/20 647/21 649/11 649/17 690/15 690/19 691/2 691/9 698/18 698/20 699/4 718/15 723/7 730/4 754/15 754/21 756/6</p> <p>just [214] 510/1 510/9 512/2 512/7 512/21 513/6 514/12 517/2 517/24 518/13 518/22 519/22 520/13 522/2 522/10 525/15 526/21 527/21 528/12 529/7 529/8 529/8 530/14 531/12 532/1 533/17 533/21 534/4 536/3 536/11 539/5 540/25 541/3 541/8 541/13 541/19 542/2 542/6 542/9 542/11 543/5 543/13 543/14 544/13 544/15 544/22 545/11 545/17 545/18 546/6 546/16 546/18 548/1 548/21 548/23 549/8 549/17 549/18 549/19 550/5 550/12 550/14 550/16 550/17 550/21 551/19 551/20 552/15 553/12 554/3 554/9 554/12 555/5 555/10 556/8 556/8 556/14 556/16 557/7 557/18 558/18 558/23 558/24 559/2 560/12 562/3 562/12 562/18 562/24 563/7 563/13 563/21 563/23 563/23 564/13 564/16 564/17 565/10 565/12 565/15 565/17 566/17 566/23 567/3 567/9 567/10 567/12 567/14 567/15 567/18 568/12 570/8 570/25 571/2 571/3 571/4 572/19 572/20 572/22 573/14 573/15 573/20 574/6 577/11 581/21 582/21 582/22 583/2 583/4 584/6 584/24 585/17 586/3 590/11 591/13 593/8 593/10 594/10 595/23 596/5 598/17 598/18 598/19 598/19 599/7 600/6 600/12 600/14 601/21 610/12 618/3 618/16 622/2 627/2 628/6 629/12 638/16 640/9 641/17 641/19 642/2 642/14 643/11 644/9 644/9 655/6 655/8 657/1 657/10 660/24 666/19 668/11 677/18 678/4 679/23 681/23 686/5 687/16 688/16 695/2 700/7 700/7 700/17 701/13 701/19 702/2 705/2 705/3 710/8 710/21 713/9 714/4 716/10 720/22 724/6 724/13 724/18 725/14 726/20 726/22 728/19 731/2 738/1 741/18 746/23 749/7 749/12 749/18 751/18 752/7 753/2 753/3 754/22 755/15</p> <p>justified [1] 518/19</p>
	<p>K</p> <p>Karen [32] 521/17 568/14 568/15 568/16 568/17 568/23 569/23 570/17 572/25 577/2 577/14 578/2 578/8 578/9 583/13 583/22 584/17 589/3 589/7 589/13 590/2 590/3 590/9 590/18 591/2 591/4 591/16 595/3 628/13 628/15 675/7 685/22</p> <p>Karen Belknap [1] 572/25</p> <p>Kateri [10] 539/25 540/7 540/14 540/14 540/17 540/18 540/23</p>

<p>K</p> <p>Kateri... [3] 542/14 542/22 574/11</p> <p>keep [14] 566/15 569/13 582/9 585/5 585/6 629/12 635/11 646/24 647/16 665/11 689/8 690/15 692/8 726/11</p> <p>keeping [3] 528/3 721/5 726/13</p> <p>keeps [2] 641/8 641/9</p> <p>Kelpto [3] 608/19 609/1 609/4</p> <p>kept [3] 558/24 590/25 725/2</p> <p>Ketari [2] 665/6 665/10</p> <p>Kevin [2] 667/25 710/16</p> <p>kewl [1] 605/24</p> <p>key [3] 513/1 620/9 620/11</p> <p>kids [10] 538/17 566/14 566/15 566/19 567/7 567/17 600/17 674/5 719/5 723/10</p> <p>kind [98] 538/15 538/16 538/22 540/10 540/21 544/3 544/11 544/13 545/16 546/14 548/2 548/4 548/9 548/13 548/16 548/21 548/22 548/23 549/5 549/5 549/15 549/19 549/19 549/22 550/1 550/3 550/6 550/8 550/14 550/18 551/13 551/20 552/3 553/10 553/16 555/10 556/5 556/7 556/21 556/25 557/15 557/18 559/12 560/18 561/4 561/17 561/18 562/25 563/2 563/7 563/24 564/1 566/16 567/5 568/12 569/2 569/13 570/2 571/4 572/2 572/4 572/5 572/10 573/3 576/20 576/21 579/22 580/3 580/20 582/20 583/22 585/8 585/20 593/1 593/1 593/8 593/15 597/17 599/17 622/16 622/16 640/23 662/12 664/14 680/18 701/25 708/1 708/16 708/17 714/18 720/22 723/17 724/3 724/6 724/7 725/6 726/11 726/22</p> <p>kinds [2] 641/2 641/8</p> <p>kitchen [2] 564/14 600/16</p> <p>knew [20] 539/3 554/23 558/16 566/24 568/4 580/22 584/23 593/8 636/22 637/24 645/14 654/15 680/24 706/20 707/1 714/11 740/18 740/25 746/21 752/25</p> <p>knot [2] 565/12 565/13</p> <p>know [175] 511/22 512/6 512/23 512/24 519/8 524/6 525/21 532/25 533/5 537/13 538/25 540/25 541/5 541/6 541/7 541/12 541/14 541/18 544/6 544/13 544/16 545/1 545/11 546/16 546/24 548/3 549/22 550/15 550/15 551/1 552/20 553/2 554/2 554/4 554/11 555/7 555/7 555/23 556/11 556/20 557/21 558/12 558/13 559/11 559/11 559/12 559/12 559/15 559/16 559/16 560/18 560/18 560/20 560/20 561/2 562/20 563/9 564/12 564/13 567/13 568/18 568/20 572/21 573/17 573/20 575/3 577/8 577/15 578/15 578/24 579/10 579/12 579/17 588/2 589/15 589/19 590/6 590/16 591/22 592/21 593/22 594/15 595/7 598/25 606/7 609/5 609/14 609/15 609/23 609/25 615/22 618/11 618/15 623/20 625/24 626/5 626/7 631/7 631/19 632/6 633/10 633/12 634/6 634/10 635/6 635/7 639/8 639/9 643/8 645/11 646/8 650/2 661/8 662/10 662/14 662/19 662/22 663/2 663/3 663/3 663/4 665/9 665/18 668/5 668/6 682/2 686/24 688/5 688/12 688/13 689/7 692/3 699/6 701/19 706/25 708/25 709/4 709/5 709/18 710/8 710/11 710/15 710/20 715/5 715/10 716/9 717/12 718/19 719/16 721/9 721/20 722/6 723/11 723/25 724/17 724/20 725/8 725/14 725/18 740/22 742/20 742/21 744/6 745/22 745/23 746/1 746/7 748/2 749/15 751/6 751/13 751/19 751/21 751/23 755/24</p> <p>knowing [1] 575/4</p> <p>knowledge [5] 728/25 729/3 729/5 739/7 746/22</p> <p>knowledgeable [1] 555/2</p> <p>known [11] 579/12 604/4 635/3 658/13 658/17 684/14 686/9 718/23 718/24 723/17 724/18</p> <p>knows [4] 531/9 537/6 553/25 553/25</p>	<p>larger [2] 532/15 622/2</p> <p>last [30] 511/8 511/18 516/21 518/11 523/7 527/4 538/1 564/20 565/17 583/24 598/24 600/25 605/15 619/2 632/16 633/22 678/19 691/17 693/8 693/23 697/11 698/24 700/15 718/10 719/7 720/5 722/24 729/20 730/13 740/20</p> <p>lastly [1] 731/12</p> <p>late [10] 525/16 593/6 593/9 618/7 663/7 663/13 720/18 720/19 725/19 726/5</p> <p>later [11] 543/2 543/18 551/7 551/13 577/1 584/3 610/23 639/2 639/5 640/21 673/9</p> <p>lateral [4] 709/1 709/23 710/3 745/21</p> <p>laugh [1] 725/19</p> <p>laughed [2] 549/5 550/14</p> <p>laughing [3] 604/22 604/23 721/1</p> <p>Laura [1] 723/1</p> <p>Laura Dawn Benson [1] 723/1</p> <p>law [4] 507/3 618/4 621/6 732/19</p> <p>lawsuit [1] 751/20</p> <p>lawyer [3] 573/16 600/2 716/23</p> <p>lawyers [3] 617/18 643/3 695/17</p> <p>lay [1] 691/10</p> <p>layoff [1] 742/19</p> <p>layoffs [1] 742/15</p> <p>lead [10] 539/22 546/13 546/17 562/13 563/12 592/25 593/1 610/7 687/9 703/14</p> <p>leader [4] 543/11 547/18 631/14 743/17</p> <p>leadership [18] 551/12 564/23 588/10 619/23 652/16 665/5 669/19 669/23 670/11 682/10 683/7 683/18 684/2 684/5 684/9 708/24 709/6 744/1</p> <p>leading [3] 547/16 547/24 619/19</p> <p>learn [5] 577/6 721/11 749/5 750/4 753/1</p> <p>learned [6] 545/9 675/14 688/20 721/15 721/23 726/24</p> <p>learning [2] 583/18 727/2</p> <p>least [12] 531/16 584/17 632/10 662/16 689/16 696/17 706/5 725/12 737/9 737/17 752/13 752/14</p> <p>leave [34] 529/22 529/24 529/25 530/6 530/6 531/8 548/15 562/15 585/11 585/13 585/20 586/6 587/13 587/14 588/4 588/24 588/24 589/3 592/13 595/13 596/17 596/19 681/2 681/16 681/17 682/5 685/15 686/16 687/1 707/6 715/2 715/17 737/6 740/20</p> <p>leaving [2] 700/19 754/16</p> <p>led [1] 644/19</p> <p>Lee [1] 698/25</p> <p>left [15] 519/14 519/17 548/15 549/18 561/18 572/22 581/21 581/25 592/19 592/20 592/21 596/5 616/15 707/16 708/5</p> <p>legal [10] 509/17 510/23 518/2 639/10 639/18 641/6 722/25 751/15 751/16 753/7</p> <p>length [3] 582/5 750/16 750/19</p> <p>less [3] 700/23 701/7 750/20</p> <p>lesser [2] 737/7 737/18</p> <p>let [25] 511/15 531/3 532/25 544/13 544/16 546/16 550/18 555/23 570/10 588/11 590/6 595/7 598/18 600/2 618/11 630/15 631/7 643/8 665/9 665/18 678/23 707/9 725/5 734/23 756/11</p> <p>let's [82] 525/15 531/4 539/7 539/8 542/15 544/9 547/10 550/13 551/4 551/18 563/7 564/2 567/16 567/20 568/21 569/14 570/9 570/12 571/7 572/23 573/4 575/12 577/22 577/23 581/1 590/1 591/14 594/21 598/23 602/6 603/20 603/23 603/24 603/24 604/16 605/6 605/18 608/7 610/14 614/15 615/20 617/4 625/9 625/21 629/20 631/21 635/8 635/15 636/7 636/7 636/25 636/25 637/5 637/14 643/19 651/2 657/24 658/12 659/10 659/19 660/3 665/1 668/9 669/10 672/20 672/23 674/11 674/11 675/6 675/10 676/22 677/13 681/4 684/19 684/20 687/21 688/19 698/17 703/22 705/1 727/24 743/12</p> <p>letter [4] 530/1 703/23 716/3 716/14</p> <p>letting [2] 609/5 609/15</p> <p>level [23] 573/16 573/17 577/22 629/23 709/3 709/4 709/4 710/7 710/8 710/10 725/25 726/1 729/2 736/2 736/9 737/13 737/21 746/10 746/14 746/17 746/20 748/7 750/23</p> <p>level-set [1] 629/23</p> <p>levels [1] 728/22</p> <p>Lewis [2] 507/6 507/9</p> <p>liability [2] 510/17 510/19</p> <p>liaison [2] 554/21 563/10</p>
<p>L</p> <p>label [17] 514/23 515/15 553/1 556/7 565/22 573/17 573/18 589/21 591/12 620/14 627/17 633/20 658/6 660/14 662/1 662/7 662/8</p> <p>Labor [3] 543/19 750/16 751/5</p> <p>lack [2] 610/15 711/5</p> <p>ladder [2] 580/19 684/11</p> <p>ladies [3] 618/2 690/19 691/9</p> <p>laid [4] 595/24 742/21 742/25 750/7</p> <p>Lake [9] 560/10 650/24 655/13 655/17 655/23 656/5 711/4 711/13 712/4</p> <p>lamotrigine [2] 696/7 697/22</p>	

<p>L</p> <p>license [1] 605/25</p> <p>licensed [1] 723/8</p> <p>lies [1] 713/25</p> <p>lieu [1] 690/21</p> <p>life [5] 719/5 723/17 726/19 726/21 731/12</p> <p>life-care [1] 731/12</p> <p>life-long [2] 723/17 726/21</p> <p>lifetime [1] 737/25</p> <p>light [6] 509/16 520/18 520/18 527/9 527/11 527/12</p> <p>lights [2] 566/12 674/2</p> <p>like [175] 509/4 509/19 511/15 514/8 515/22 518/3 519/24 526/21 528/8 530/22 532/21 538/15 538/21 541/6 541/24 542/20 543/4 543/8 544/4 544/4 544/10 545/4 545/5 545/6 545/10 545/20 547/8 547/23 548/1 548/11 548/13 549/7 549/8 549/24 550/1 550/6 550/12 550/18 550/20 550/21 550/23 551/20 552/14 552/18 553/11 554/10 554/11 554/18 554/22 555/22 556/21 557/3 557/15 558/15 558/16 558/16 559/15 559/22 559/23 560/10 560/12 561/19 562/4 562/5 562/18 562/20 563/12 563/23 565/3 565/4 565/5 565/10 565/12 565/12 566/16 566/22 566/24 567/6 569/12 569/17 570/10 570/13 571/10 571/25 572/6 572/22 572/23 577/5 577/7 579/2 579/6 579/17 579/22 579/24 580/23 582/4 582/7 582/10 582/18 582/22 582/22 582/25 583/21 585/16 586/12 586/17 586/17 586/18 586/20 586/24 587/1 587/4 587/18 591/10 593/1 593/4 593/7 593/13 593/13 593/15 595/3 597/10 598/5 600/12 602/3 611/13 618/16 624/3 627/11 629/12 641/3 645/14 648/9 648/13 648/15 648/21 653/16 655/25 664/14 664/24 666/1 671/9 687/1 692/10 692/20 699/12 700/6 700/15 701/25 705/7 708/23 710/19 713/6 714/7 717/23 718/1 720/16 720/18 720/18 720/25 721/7 721/9 724/23 725/2 725/6 725/17 725/24 726/1 726/3 728/9 732/7 732/24 753/19 754/12 756/10</p> <p>liked [4] 540/10 576/22 605/21 713/6</p> <p>likely [3] 736/13 736/16 739/21</p> <p>liking [1] 605/21</p> <p>limine [26] 522/21 529/9 529/11 534/7 534/9 534/11 534/14 534/15 534/18 534/19 534/20 534/22 534/23 534/24 535/4 535/5 535/6 535/7 535/8 535/12 535/13 535/14 535/17 535/18 535/19 536/9</p> <p>limited [1] 592/16</p> <p>limiting [4] 530/9 535/24 536/18 682/25</p> <p>Linda [10] 553/22 554/3 554/7 555/4 563/11 670/23 688/7 702/18 703/24 712/1</p> <p>line [18] 539/6 554/15 554/18 563/19 563/21 564/1 564/7 565/6 571/13 591/18 595/2 604/16 608/8 623/7 694/13 706/21 706/22 706/24</p> <p>lines [5] 512/24 620/22 661/23 662/3 662/5</p> <p>linked [3] 574/13 575/9 660/21</p> <p>linking [1] 575/1</p> <p>lipids [1] 696/15</p> <p>list [13] 523/13 523/18 526/3 526/20 527/14 527/15 527/16 532/23 533/17 606/7 696/20 697/19 741/15</p> <p>listed [2] 741/13 741/23</p> <p>listen [1] 569/9</p> <p>listened [1] 734/5</p> <p>listening [4] 548/21 593/8 593/10 606/7</p> <p>lists [1] 696/15</p> <p>literally [4] 556/9 562/24 601/14 664/24</p> <p>little [42] 512/8 539/8 541/23 542/5 542/6 545/15 546/1 547/11 552/2 553/10 555/7 556/16 560/6 561/11 561/12 564/3 567/12 568/25 570/18 580/20 581/7 587/4 632/25 643/10 645/5 646/21 647/23 661/2 664/2 671/9 679/10 679/13 696/2 706/6 711/11 711/13 714/7 715/14 721/8 724/6 727/24 746/8</p> <p>live [6] 517/1 650/14 690/21 718/21 725/11 728/5</p> <p>lived [2] 723/13 723/14</p> <p>lives [4] 601/17 601/17 601/21 726/17</p> <p>living [1] 746/5</p> <p>LLP [2] 507/6 507/9</p> <p>lobby [1] 711/1</p> <p>local [8] 630/17 630/20 660/9 660/11 660/13 660/17 666/23 667/3</p> <p>locally [1] 631/3</p>	<p>located [2] 711/10 712/3</p> <p>lock [1] 539/2</p> <p>lock-in-step [1] 539/2</p> <p>locked [1] 592/15</p> <p>LOL [1] 604/21</p> <p>long [19] 515/25 517/11 530/16 530/19 531/12 538/6 545/2 545/19 657/17 658/18 659/16 713/11 718/23 723/17 723/17 726/21 738/8 750/6 756/11</p> <p>long-term [1] 723/17</p> <p>longer [6] 529/16 543/20 547/2 588/6 598/18 748/22</p> <p>look [69] 510/15 533/25 540/21 543/1 545/24 554/14 557/20 560/13 561/23 564/20 568/21 569/24 570/3 570/12 571/7 572/23 574/17 574/19 575/12 575/16 581/1 591/9 591/14 594/21 598/23 600/19 603/24 603/24 604/16 605/6 605/18 606/24 608/7 614/21 625/9 629/20 630/10 630/15 631/21 635/8 635/16 636/7 636/25 642/2 643/13 643/19 649/23 650/2 651/2 658/12 659/11 659/19 659/20 660/3 661/6 661/23 665/8 672/20 674/12 675/10 675/13 680/25 681/4 684/20 686/19 689/25 693/10 733/9 756/8</p> <p>look/sign [1] 533/25</p> <p>looked [29] 522/9 544/11 549/1 549/1 549/8 553/14 553/16 553/17 560/18 569/6 572/2 644/9 645/6 649/24 649/25 664/8 671/9 695/2 695/24 695/24 707/9 736/3 736/3 736/5 738/6 747/14 747/18 749/1 753/16</p> <p>looking [27] 538/11 540/19 541/4 554/18 555/4 579/5 591/16 600/16 614/15 627/6 645/2 651/3 658/12 658/21 662/2 680/16 680/20 681/1 693/17 694/3 694/3 694/4 703/22 708/14 708/17 708/20 709/3</p> <p>looks [4] 554/18 570/13 571/10 724/13</p> <p>loss [2] 737/25 747/7</p> <p>lost [6] 509/12 509/17 587/9 593/21 738/23 755/5</p> <p>lot [20] 560/9 562/22 576/19 646/6 648/8 653/17 673/15 673/21 676/7 684/3 684/6 684/8 687/24 696/3 708/24 720/4 720/15 725/23 726/19 727/7</p> <p>lots [1] 565/12</p> <p>loud [2] 604/22 604/23</p> <p>love [4] 540/4 545/8 545/8 605/24</p> <p>loved [8] 538/11 538/12 575/4 575/5 585/5 708/19 722/1 722/7</p> <p>loves [3] 719/14 719/14 719/15</p> <p>low [2] 559/9 726/2</p> <p>lower [3] 652/25 653/7 748/9</p> <p>LP [1] 506/6</p> <p>lucky [1] 671/18</p> <p>lunch [3] 517/2 617/14 646/14</p> <p>lunches [1] 714/4</p> <p>lungs [1] 657/6</p> <p>lying [1] 562/25</p> <hr/> <p>M</p> <p>M-c-C-U-L-L-O-U-G-H [1] 619/4</p> <p>ma'am [10] 537/23 632/19 647/4 692/5 697/7 697/11 722/15 722/18 728/19 729/9</p> <p>Madalina [1] 631/7</p> <p>made [42] 511/8 514/25 529/14 529/14 549/12 566/19 569/15 576/10 576/25 610/16 610/19 611/7 611/10 615/21 625/25 644/24 666/14 672/17 672/21 673/8 674/15 674/23 675/2 685/5 685/10 685/12 697/19 706/7 706/11 706/14 706/21 706/23 707/2 711/6 724/21 734/4 737/8 742/12 743/13 743/13 743/21 749/8</p> <p>MAGISTRATE [1] 506/12</p> <p>Magnuson [2] 533/14 537/6</p> <p>mail [2] 598/4 618/15</p> <p>main [2] 696/13 710/22</p> <p>majority [1] 521/6</p> <p>make [48] 510/14 510/24 522/5 526/22 529/24 529/24 530/7 533/22 544/20 544/23 548/6 550/15 557/4 557/4 557/6 558/6 558/10 558/12 558/24 558/25 567/6 573/15 580/10 595/6 596/2 635/14 637/21 644/25 646/14 646/17 664/3 664/21 666/25 667/4 678/9 678/13 678/15 687/8 689/5 691/1 694/4 696/2 725/5 725/21 735/3 751/7 751/18 753/2</p> <p>makers [2] 521/18 644/21</p> <p>makes [7] 509/25 512/4 623/20 656/19 667/6 677/21 679/11</p> <p>making [16] 527/11 539/2 539/5 571/1 571/2 571/5 601/20</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

M	me [126]
making... [9] 612/13 636/4 681/13 682/9 682/17 685/8 721/2 734/8 734/24	542/19 543/14 543/16 544/17 545/19 546/13 546/15 546/18 547/4 547/15 549/1 549/2 549/2 549/7 549/8 549/9 550/12 551/2 551/13 552/9 555/8 556/16 559/14 563/6 565/16 565/25 567/2 567/11 567/11 568/12 568/18 569/9 569/15 570/10 572/25 573/10 574/15 576/21 576/22 576/22 577/11 581/18 582/1 582/20 583/25 584/15 584/17 584/22 585/8 585/10 585/23 586/7 586/8 586/9 586/10 586/16 587/21 588/11 589/12 590/5 590/6 590/24 591/10 591/10 591/20 592/3 592/8 592/18 594/6 594/7 595/3 595/4 595/7 601/18 602/14 604/13 604/24 605/12 609/2 609/8 614/11 626/6 627/13 630/15 633/3 634/7 637/17 638/2 643/8 645/16 649/7 652/2 655/25 658/24 665/9 665/18 668/25 668/25 669/5 678/23 680/24 682/16 687/19 687/19 690/8 690/10 700/19 713/14 717/14 722/5 725/5 731/7 734/23 741/4 741/8 744/10 744/14 745/1 748/14
Man [1] 549/20	mean [20] 526/15 540/9 541/12 548/12 562/5 562/21 587/16 632/9 661/6 662/17 664/15 688/11 693/16 701/21 710/23 713/21 713/21 723/25 728/5 751/15
manage [2] 718/17 724/7	meaning [4] 616/4 629/23 650/15 703/5
management [4] 547/12 551/4 637/21 704/6	meaningful [1] 522/15
manager [27] 519/17 539/19 550/25 556/4 562/12 563/12 565/22 579/23 581/20 597/3 597/16 601/4 602/23 622/23 633/20 652/12 657/11 666/6 704/7 704/10 713/9 736/25 742/24 748/1 748/4 748/10 749/1	means [4] 587/17 609/4 616/2 618/6
manager's [1] 738/12	meant [5] 544/23 613/5 654/15 681/12 748/9
managerial [4] 738/5 738/6 738/13 738/15	meantime [1] 581/25
managers [23] 512/11 512/14 512/15 516/2 516/3 547/19 574/4 581/24 581/24 581/25 582/2 586/9 586/16 629/8 629/18 653/16 663/1 670/11 686/18 742/15 742/22 747/15 747/19	median [1] 750/19
managers' [3] 516/2 516/5 635/2	medical [23] 523/19 524/9 524/11 524/15 524/16 525/7 554/22 554/23 557/23 563/10 587/24 681/16 692/18 694/1 695/3 695/8 696/20 697/24 715/2 715/17 730/22 730/22 754/25
Mandy [6] 554/20 554/21 555/18 555/21 556/5 670/25	medication [6] 574/13 575/7 696/7 697/22 698/2 717/18
Mandy Hosford [1] 554/20	medications [4] 558/20 574/18 694/5 729/1
manner [3] 518/18 627/24 638/10	medicine [2] 556/25 691/22
many [17] 629/13 629/13 678/12 682/15 686/24 691/25 692/2 700/17 700/18 700/21 731/25 732/5 739/8 745/17 745/23 751/10 752/10	meet [1] 699/8
Maran [1] 550/5	meeting [93] 539/7 539/8 539/10 540/3 540/10 540/24 541/2 547/13 547/15 547/16 547/18 547/24 547/25 548/1 548/3 548/17 549/17 551/4 551/5 551/8 551/9 551/9 551/14 551/17 551/20 552/11 553/22 555/15 555/15 555/19 555/20 557/9 557/10 557/14 564/11 569/20 569/22 570/3 570/21 571/21 571/24 573/6 573/23 574/2 577/1 577/4 577/6 583/12 585/25 586/1 586/3 591/15 592/23 594/25 609/3 609/15 615/21 615/23 617/7 651/15 651/18 651/20 668/23 669/7 669/10 669/12 669/23 670/1 671/4 671/13 671/19 672/3 672/7 672/10 672/14 672/18 673/11 673/12 673/14 673/19 675/11 680/7 680/9 680/10 680/12 682/13 683/21 704/9 704/14 705/9 712/8 713/15 715/11
Maratas [1] 594/3	meetings [5] 514/22 585/24 595/11 688/12 712/2
March [19] 549/16 657/19 658/1 659/12 659/13 660/5 668/4 668/14 681/4 681/6 681/7 681/16 692/23 694/25 695/20 696/6 711/9 713/13 737/15	meets [1] 630/21
March 18th [1] 681/6	Melinda [1] 507/6
March 1st [3] 692/23 695/20 696/6	member [3] 619/23 724/10 731/10
March 2019 [1] 694/25	members [5] 617/14 658/14 659/3 690/15 754/15
March 2020 [1] 737/15	memories [1] 534/3
March/April [1] 711/9	mental [4] 574/20 636/3 636/6 723/9
market [7] 507/10 539/5 558/16 601/13 635/23 659/21 685/3	mentally [1] 579/1
marketing [9] 565/22 589/21 591/12 620/14 622/20 627/17 633/20 709/17 743/17	mention [6] 584/16 608/1 611/8 673/7 673/9 714/21
Maryland [1] 732/11	mentioned [10] 511/22 560/1 596/2 600/6 600/9 607/4 607/23 631/22 676/1 713/13
mask [2] 702/15 718/7	mentioning [1] 694/18
master's [3] 731/4 731/4 731/6	mentions [1] 581/15
material [1] 739/12	merit [1] 632/7
materials [3] 657/23 657/25 744/14	mess [1] 585/18
math [1] 755/22	message [18] 543/22 544/8 544/8 547/7 554/18 573/7 591/23 592/7 594/2 594/3 594/5 594/12 594/16 594/19 604/7 605/14 608/7 608/8
matrix [2] 587/1 596/3	messages [12] 554/16 592/19 592/20 592/22 596/6 603/20 603/23 606/20 640/21 713/4 713/6 713/7
Matt [1] 597/2	messaging [6] 539/1 666/2 666/8 666/13 666/16 723/21
matter [9] 556/17 586/2 586/3 588/16 687/19 704/24 725/18 754/18 755/4	met [10] 537/14 621/22 630/22 630/24 632/22 671/2 675/6 688/9 688/11 723/12
matter-of-fact [2] 586/2 586/3	metrics [1] 660/23
mattered [1] 583/3	metro [1] 730/7
matters [3] 520/21 639/24 640/6	mic [2] 716/6 723/2
may [59] 511/12 515/13 523/23 524/7 525/4 526/22 529/2 531/14 533/4 533/15 545/6 557/4 571/3 589/2 589/2 589/9 589/19 589/24 591/16 591/17 592/12 592/23 594/22 596/14 596/22 606/22 606/25 607/7 607/7 610/22 614/15 622/22 623/6 641/21 642/20 646/1 647/11 672/19 680/5 690/11 691/9 695/20 698/9 702/8 702/15 704/21 707/7 712/16 716/7 717/22 718/6 722/13 722/15 727/10 727/13 729/7 736/21 739/11 754/8	mid [9] 577/5 577/6 578/2 592/23 615/9 615/12 616/15 652/9 676/3
May 14th [1] 594/22	mid-2018 [5] 615/9 615/12 616/15 652/9 676/3
May 16th [1] 591/17	mid-February [3] 577/5 577/6 578/2
May 2018 [1] 614/15	
May 2019 [5] 589/2 592/12 596/22 606/25 610/22	
May 3rd [5] 589/2 589/9 589/19 589/24 591/16	
May 3rd with [1] 712/16	
maybe [29] 524/1 539/17 539/18 543/8 543/9 544/2 549/16 556/18 559/24 561/16 561/17 567/22 577/23 597/10 597/16 607/2 609/24 627/11 643/12 669/6 671/17 685/7 689/4 700/15 702/20 703/24 721/7 721/7 754/13	
Mazumdar [1] 507/2	
McCarthy [13] 507/9 518/13 518/22 519/7 521/15 525/21 526/20 526/21 528/19 531/16 661/14 695/16 697/12	
McCarthy's [1] 532/19	
McCullough [16] 508/5 618/22 619/4 619/7 619/12 629/4 630/10 634/21 639/21 640/11 642/16 643/3 644/13 647/22 648/13 649/3	

M	
mid-May [1] 592/23	598/19 617/19 629/2 630/8 641/15 648/17 680/19 719/20
middle [2] 603/12 697/1	724/23 724/25 727/9 727/24
midst [2] 669/3 683/10	moved [1] 648/23
might [14] 540/15 544/12 568/22 580/21 583/15 583/18 589/9	movie [2] 726/6 726/7
635/13 689/7 723/18 729/1 743/10 745/2 753/18	moving [8] 514/7 647/16 684/11 709/10 709/13 709/14 710/3
migraine [5] 523/14 523/20 530/5 587/18 717/18	710/6
migraines [25] 530/5 530/8 530/12 530/16 530/19 530/20	Mr [1] 740/10
530/21 531/11 532/11 585/14 587/19 600/9 693/4 693/8 693/9	Mr. [71] 512/3 512/12 512/13 512/14 512/14 512/16 512/16
694/7 694/11 694/23 696/15 715/21 716/1 716/4 717/15 717/16	514/13 514/13 514/14 515/6 515/6 515/13 515/18 515/23
720/15	515/24 515/24 516/21 517/4 517/8 517/8 517/10 517/13 517/15
Mike [21] 568/15 568/20 568/23 569/23 569/24 569/25 570/8	517/17 518/13 518/22 519/7 521/1 521/15 525/21 526/20
570/16 572/24 573/2 573/7 581/8 581/10 591/18 592/1 592/5	526/21 528/16 528/19 529/8 531/16 532/4 532/19 533/14 537/6
592/7 630/17 638/1 644/16 645/16	537/18 608/25 618/19 629/2 643/7 643/15 643/19 644/1 644/5
mild [5] 552/22 553/9 558/1 572/16 573/12	646/17 661/14 684/21 685/7 697/12 711/21 712/13 729/13
Mill [1] 507/7	730/3 732/25 740/24 743/7 747/5 748/14 749/25 750/24 754/3
Mina [4] 631/8 631/8 631/10 631/16	755/7 755/8 755/25 755/25
mind [8] 554/13 556/4 564/17 565/10 565/10 591/1 591/3 726/4	Mr. Barnes [3] 512/13 515/23 515/24
minded [1] 719/25	Mr. Edelman [2] 755/8 755/25
mine [1] 696/1	Mr. Gray [1] 712/13
mini [4] 518/21 519/18 521/9 522/23	Mr. Griffith [8] 512/14 512/16 515/6 515/6 515/13 515/18
mini-trials [1] 518/21	608/25 711/21
minimize [1] 511/22	Mr. Hinson [2] 755/7 755/25
minute [5] 513/13 525/16 588/15 631/21 647/12	Mr. Magnuson [2] 533/14 537/6
minutes [15] 509/6 533/1 593/7 643/12 643/15 643/23 648/7	Mr. McCarthy [11] 518/13 518/22 519/7 521/15 525/21 526/20
648/8 649/3 649/4 649/4 696/4 755/8 755/8 755/20	526/21 528/19 531/16 661/14 697/12
misleading [5] 522/2 658/10 660/15 662/15 662/24	Mr. McCarthy's [1] 532/19
misplaced [1] 513/16	Mr. Oswald [16] 514/13 517/17 528/16 529/8 532/4 537/18
miss [5] 552/24 553/11 553/15 553/16 700/1	618/19 629/2 643/7 643/15 643/19 644/1 644/5 646/17 684/21
missed [8] 543/9 551/10 551/16 552/25 553/21 669/17 686/15	685/7
687/5	Mr. Oswald's [1] 512/3
missing [1] 594/17	Mr. Scott [2] 729/13 732/25
misunderstanding [2] 518/24 526/23	Mr. Severt [8] 730/3 740/24 743/7 747/5 748/14 749/25 750/24
mix [1] 512/11	754/3
mixed [1] 712/1	Mr. Stickle [5] 512/12 515/24 516/21 517/4 517/10
moderate [5] 552/23 553/9 558/1 572/16 573/12	Mr. Thomsen [9] 512/14 512/16 514/13 514/14 517/8 517/8
mom [3] 724/5 724/9 724/12	517/13 517/15 521/1
moment [15] 537/15 563/8 588/11 599/22 600/2 624/12 625/10	Ms [15] 515/1 516/13 516/23 516/24 530/19 538/6 640/11
630/8 640/9 641/21 642/20 695/13 729/15 736/12 750/24	648/14 651/4 670/8 673/4 702/5 733/7 743/16 746/19
momentarily [1] 625/12	Ms. [256]
Monday [13] 538/18 538/20 577/12 586/10 586/13 596/12	Ms. Abbonizio [4] 688/18 688/20 688/22 704/4
617/21 625/17 649/2 649/5 649/10 756/4 756/6	Ms. Belknap [8] 529/21 675/11 675/16 680/13 706/15 712/8
money [2] 558/10 679/24	712/16 715/16
month [9] 517/9 539/16 539/17 539/17 592/13 614/15 675/1	Ms. Benson [1] 511/21
705/18 749/22	Ms. Capell [2] 511/20 699/3
month-and-a-half [1] 539/17	Ms. Ceaser [2] 706/15 712/17
months [22] 544/2 561/23 565/17 576/19 606/20 608/3 608/4	Ms. Chambers [11] 520/1 538/3 563/4 588/11 588/20 650/1
610/23 611/10 616/17 626/16 627/11 663/10 668/11 676/16	669/11 691/5 695/25 734/13 754/11
693/8 693/23 723/19 749/14 749/18 749/23 750/12	Ms. DiNunzio [75] 512/19 513/9 514/19 514/23 515/6 519/3
more [53] 517/14 517/14 519/15 519/15 525/4 534/2 536/11	519/11 520/8 530/17 602/7 602/16 602/23 603/15 604/18 605/4
548/6 548/14 549/20 553/8 554/24 555/7 555/11 556/16 557/5	605/6 605/19 605/21 606/11 607/11 607/16 610/12 610/16
560/6 562/4 575/5 575/6 576/20 577/11 577/23 582/3 586/15	611/15 614/17 615/9 615/21 616/4 616/19 650/20 650/23
592/4 596/14 596/16 598/21 600/14 608/22 609/9 612/25 613/6	651/15 651/21 651/25 655/2 655/11 659/3 665/4 665/14 665/21
615/10 615/19 616/13 649/5 650/24 674/16 676/5 679/19	668/9 668/20 669/12 670/2 670/16 671/2 672/18 673/10 673/13
684/12 694/19 709/6 719/24 720/15 721/6 721/16 726/22 727/3	674/15 674/23 675/7 675/17 675/21 675/25 676/6 676/13
736/16 750/5	676/17 678/8 678/23 679/4 680/13 682/1 682/8 682/14 683/3
Morgan [2] 507/6 507/9	686/11 686/20 686/21 687/15 689/1 689/10 706/20 711/14
morning [19] 509/4 529/9 532/14 537/11 537/13 537/21 537/22	712/9
538/6 538/10 538/18 538/20 573/6 585/17 588/13 646/3 648/23	Ms. DiNunzio's [2] 662/23 675/7
754/18 755/8 756/4	Ms. Gibb [2] 718/2 718/5
most [8] 574/24 652/18 652/21 699/21 709/15 710/12 712/19	Ms. Gibbs [1] 511/20
723/25	Ms. Grey [3] 666/11 666/22 675/2
mostly [1] 737/12	Ms. Hamilton [6] 512/14 512/18 514/15 515/2 515/4 515/8
mother [1] 674/7	Ms. I've [1] 749/17
Mother's [1] 719/8	Ms. Ivie [93] 511/19 512/17 512/18 514/15 514/16 514/19
motion [27] 519/25 522/21 529/9 532/8 534/7 534/9 534/11	514/25 515/9 515/15 515/17 515/24 516/2 516/8 516/22 517/5
534/13 534/15 534/17 534/19 534/20 534/21 534/23 534/24	517/12 518/1 519/14 519/17 520/8 520/8 520/9 520/11 520/13
535/4 535/5 535/6 535/7 535/8 535/12 535/12 535/14 535/17	520/17 521/2 530/16 532/11 536/23 644/21 647/10 648/21
535/18 535/19 536/8	648/25 649/8 649/12 649/19 672/24 675/24 676/7 676/14
motivated [1] 652/15	688/22 690/11 693/2 694/2 694/15 696/5 702/12 702/13 704/21
Mountain [1] 554/19	717/25 725/2 728/20 728/25 731/14 733/11 733/24 734/20
move [19] 522/25 567/10 567/20 589/2 590/19 590/22 590/24	736/13 737/20 738/4 738/8 739/6 739/19 740/15 740/25 741/2
	741/20 742/8 742/22 743/9 743/13 744/2 744/7 744/10 744/12
	746/4 746/8 746/15 746/23 746/25 747/7 747/10 747/22 748/11

M	701/14
Ms. Ivie... [9] 749/14 750/3 750/12 750/24 751/7 751/10 752/10 753/3 754/4	needs [3] 548/5 687/9 714/5
Ms. Ivie's [24] 511/19 515/10 518/16 518/25 520/5 520/21 521/15 644/19 648/12 695/3 735/16 736/2 736/9 737/2 738/17 739/1 739/15 741/10 741/25 742/15 743/3 748/17 753/8 754/24	negatively [3] 737/3 738/17 739/1
Ms. Johnson [1] 691/12	negatives [2] 678/12 678/17
Ms. Judy [1] 718/1	nerve [1] 566/5
Ms. McCullough [13] 618/22 619/7 619/12 629/4 630/10 634/21 639/21 642/16 643/3 644/13 647/22 648/13 649/3	nerve-racking [1] 566/5
Ms. Riechert [2] 715/14 756/8	nervous [2] 566/24 597/14
Ms. Talcott [2] 752/5 752/25	network [2] 641/13 718/18
Ms. Truax [1] 515/15	neurologist [1] 694/12
Ms.DiNunzio [1] 521/17	never [38] 544/20 552/13 561/21 561/21 565/14 579/21 580/3 583/3 606/11 616/23 650/20 650/23 655/2 655/11 655/15 655/20 655/22 656/3 656/7 661/3 673/12 676/14 678/11 678/16 679/3 680/1 689/1 689/10 701/21 705/24 716/23 720/2 723/16 728/20 735/14 736/15 738/10 738/25
MTV [1] 606/6	new [31] 530/15 548/14 548/16 548/18 548/21 548/23 549/10 550/24 597/2 605/24 607/5 607/24 612/22 618/4 618/8 659/4 665/6 668/18 701/12 708/23 710/4 713/8 713/9 730/11 730/15 732/11 747/11 748/23 749/4 749/5 750/8
much [22] 511/9 545/9 553/6 564/13 564/16 617/20 617/23 618/18 628/15 647/4 661/20 684/14 687/22 690/12 700/19 701/4 710/24 720/21 725/14 747/11 754/20 756/9	new bus [1] 548/14
multi [1] 718/18	New York [1] 732/11
multi-platform [1] 718/18	newer [1] 548/14
multiple [11] 512/9 512/22 513/18 516/1 520/20 624/23 626/1 626/14 628/3 628/11 693/8	news [5] 511/10 511/12 531/22 617/18 618/13
muscles [1] 567/10	newspaper [1] 657/2
must [3] 622/18 634/17 660/17	next [35] 515/5 537/18 540/13 540/22 541/2 541/16 541/21 542/18 542/20 548/17 553/5 553/13 557/24 557/24 561/9 563/1 563/8 570/19 573/6 573/23 590/8 605/11 605/14 614/15 649/8 660/20 673/1 674/22 676/22 684/11 698/2 717/24 722/16 729/12 754/11
mutual [7] 584/10 585/1 639/6 639/12 639/15 642/10 645/8	nice [6] 550/2 550/11 550/12 569/9 580/15 714/9
mutually [1] 531/19	niceties [4] 551/20 557/16 557/18 578/11
my [165] 511/7 519/19 522/20 524/3 529/1 531/5 531/6 536/3 537/12 537/15 538/2 538/12 538/12 538/15 538/16 538/17 540/4 541/25 544/13 544/19 544/20 544/20 544/25 545/1 545/8 545/17 546/22 549/9 549/17 549/18 550/9 550/25 553/20 554/1 554/2 554/13 555/5 555/10 555/25 558/11 559/5 560/8 560/14 561/7 562/12 562/13 562/15 562/17 562/18 562/19 562/20 563/2 563/11 563/12 563/12 563/23 564/14 564/15 564/17 565/10 565/10 566/14 566/15 566/20 567/1 567/5 567/9 567/9 569/14 570/3 570/4 571/5 572/19 573/6 573/9 575/5 578/15 579/7 579/12 580/17 580/24 582/8 583/22 584/18 584/22 584/24 585/5 585/7 585/8 587/18 588/9 588/9 591/1 591/3 592/17 593/3 593/18 593/24 594/11 594/12 595/3 595/4 595/4 598/6 598/6 599/18 599/18 600/15 600/16 600/16 600/17 600/17 605/24 613/20 618/12 619/3 625/21 626/9 632/25 634/8 637/19 640/22 646/15 657/9 657/11 657/11 658/2 665/12 665/19 667/18 668/17 678/17 679/5 684/15 693/19 694/20 699/5 708/16 708/18 712/1 718/16 718/16 719/12 722/25 723/8 727/19 730/10 734/19 735/18 735/22 736/15 737/4 738/10 739/7 741/14 743/8 749/12 750/22 755/4 755/13 755/14 755/22 755/22 755/24 756/6	night [13] 511/8 511/18 526/19 527/4 538/15 538/16 550/3 557/8 565/2 567/7 567/8 567/8 578/14
myself [7] 539/11 578/13 593/24 594/10 598/16 718/24 723/12	nights [1] 538/14
N	nine [2] 544/22 685/25
name [26] 515/1 537/25 538/2 550/9 569/14 594/4 604/25 608/19 608/23 609/4 609/14 619/2 619/3 691/5 691/16 691/17 698/24 699/5 718/10 718/16 722/24 722/25 723/8 729/20 753/12 753/16	Ninth [1] 509/21
names [5] 512/10 551/3 609/10 667/20 696/21	Ninth Circuit [1] 509/21
narcology [1] 623/19	no [156] 514/4 517/17 517/23 519/9 524/12 524/14 526/23 529/16 542/11 543/25 544/3 544/9 547/1 549/5 552/18 552/18 552/18 555/23 561/3 562/5 565/21 565/23 566/11 572/21 572/21 572/21 572/22 574/3 575/6 578/17 583/2 583/8 583/11 585/3 586/22 587/9 587/12 588/5 588/6 592/10 593/17 595/4 596/12 598/18 599/10 599/18 600/18 601/2 601/5 601/9 601/23 606/13 606/21 607/4 608/2 609/4 609/15 610/11 611/9 613/11 613/12 613/15 614/3 614/6 615/8 622/12 624/24 627/1 627/8 628/14 632/4 634/22 638/16 641/23 642/16 644/16 644/20 644/23 645/25 650/22 651/1 655/5 662/19 662/22 667/15 668/5 668/10 670/15 671/7 675/25 677/3 677/15 677/18 678/2 678/4 678/5 678/7 678/8 678/10 678/11 678/13 678/21 678/23 679/2 679/4 679/8 681/7 682/4 683/12 683/16 683/24 683/25 684/1 685/8 689/14 691/8 695/6 695/6 695/11 696/19 696/24 698/8 698/14 700/2 700/4 702/5 702/7 707/22 709/9 712/21 715/9 715/13 716/21 717/20 722/4 722/8 722/11 725/18 728/21 731/22 732/13 732/17 732/23 733/3 737/22 740/5 741/8 743/1 745/25 748/21 750/11 751/25 752/4 753/23 754/6
national [10] 584/21 588/10 603/2 677/11 683/19 683/20 709/7 709/8 730/18 731/8	no one [5] 613/12 634/22 677/15 677/18 741/8
national as [1] 709/8	No. [11] 611/14 612/20 625/10 630/11 630/24 631/21 635/8 636/25 640/10 641/16 754/23
near [2] 655/13 655/17	No. 3 [3] 612/20 630/24 631/21
nearly [1] 737/9	No. 522 [1] 611/14
necessarily [9] 550/23 555/1 566/17 589/17 609/23 610/11 651/23 657/21 683/19	No. 58 [1] 625/10
necessary [1] 682/18	No. 59 [2] 640/10 641/16
need [48] 511/13 513/17 519/5 519/6 528/8 532/2 545/6 546/20 548/6 548/14 551/23 551/25 552/5 552/21 556/6 558/6 558/11 572/5 572/14 577/23 582/11 588/12 588/16 588/17 590/19 591/9 591/10 597/21 598/6 601/19 605/16 618/21 629/15 640/7 646/6 646/17 647/15 648/25 649/7 659/4 682/17 689/17 690/8 690/15 690/25 701/11 724/15 756/11	No. 6 [1] 754/23
needed [17] 539/6 547/2 551/21 572/6 573/13 582/12 585/7 598/5 617/5 654/16 664/8 668/3 668/12 669/15 670/19 682/21	No. 67 [1] 636/25
	No. 81 [1] 635/8
	No. 87 [1] 630/11
	nobody [3] 677/24 710/3 714/11
	noisemaker [1] 594/12

N noisemakers [3] 593/14 594/9 594/14 non [1] 675/24 non-selling [1] 675/24 none [6] 517/25 518/8 521/19 662/10 689/13 726/23 nonprofit [2] 558/10 558/13 noon [2] 588/16 588/17 normal [1] 725/4 normally [3] 719/2 720/18 720/25 North [1] 619/13 not [322] notched [1] 600/14 note [7] 599/2 605/7 692/15 694/20 695/21 696/12 754/23 notebook [5] 564/3 568/22 575/13 581/2 598/24 notes [10] 556/5 568/23 615/20 676/17 692/8 692/25 693/2 693/14 693/24 702/18 nothing [15] 549/6 552/1 579/24 593/25 613/24 614/1 614/4 641/5 645/23 657/13 657/16 696/17 698/3 721/9 729/6 notice [5] 611/2 617/20 618/7 700/12 701/21 noticed [5] 564/10 700/20 701/22 726/12 755/7 notification [2] 574/9 685/21 notified [6] 530/12 607/10 607/15 631/8 631/20 712/13 notifies [1] 651/5 notify [1] 631/16 notwithstanding [1] 532/20 November [2] 600/25 749/20 now [103] 512/10 512/17 512/21 515/22 517/4 517/5 518/19 525/25 526/12 526/14 527/5 527/17 528/14 528/14 528/20 529/13 536/4 548/25 549/20 552/17 554/9 556/8 557/9 562/14 563/12 563/15 563/16 567/20 571/7 576/2 576/3 576/3 576/5 576/7 576/24 579/11 586/8 588/13 590/23 592/12 595/17 597/15 602/16 603/20 603/23 604/16 606/11 607/20 608/7 608/22 608/22 614/15 615/9 616/14 623/14 624/12 625/14 626/23 630/1 630/13 631/21 634/5 635/4 636/14 636/20 637/1 637/14 639/21 640/12 642/5 643/12 648/4 649/1 649/4 652/11 653/15 654/9 656/18 659/10 663/5 668/2 669/17 670/8 670/16 671/2 672/3 673/13 673/16 674/11 675/6 675/14 676/24 679/9 681/4 682/8 685/15 687/12 705/1 708/8 733/6 738/21 742/7 744/22 nowadays [1] 688/12 nowhere [3] 583/21 584/22 673/2 number [18] 513/9 526/7 535/23 580/6 582/17 582/18 583/4 587/5 605/2 648/18 650/2 675/17 677/11 681/18 685/16 695/7 704/10 751/17 numbers [16] 538/25 559/9 561/4 579/4 579/7 580/2 580/2 581/11 650/2 652/23 705/10 705/18 706/2 706/4 749/13 749/15 nursing [1] 736/20 nurturing [1] 724/3 NW [1] 507/4	obtained [1] 744/2 obviously [1] 647/22 occasion [1] 631/19 occupation [1] 737/7 occurred [6] 599/3 637/11 663/7 686/25 714/22 740/19 occurring [1] 626/3 occurs [1] 740/19 October [3] 600/25 692/16 705/7 October 18th [1] 692/16 odd [3] 651/24 689/5 718/24 off [40] 514/23 515/15 523/3 532/18 533/19 533/25 547/4 550/5 554/25 556/7 557/6 565/11 565/22 566/24 587/19 588/9 589/21 591/12 592/19 592/20 592/21 596/5 605/17 620/14 627/17 630/13 633/20 650/2 661/3 662/1 662/7 662/8 682/10 702/2 706/4 711/1 728/8 742/21 742/25 750/7 off-brand [1] 661/3 off-label [12] 514/23 515/15 556/7 565/22 589/21 591/12 620/14 627/17 633/20 662/1 662/7 662/8 offer [1] 530/8 offered [7] 521/24 530/4 530/11 536/12 599/21 691/3 691/7 offering [3] 529/20 529/21 530/10 offers [1] 739/20 office [21] 538/17 562/17 564/15 594/11 594/12 692/15 693/3 693/14 694/4 695/4 695/9 696/6 697/6 697/14 697/20 697/25 698/2 711/18 712/10 712/14 712/18 officer [3] 663/15 664/17 665/20 offices [1] 703/6 Official [1] 757/9 often [5] 520/8 699/23 719/1 723/15 745/14 oh [39] 527/6 544/19 545/5 545/8 545/10 545/11 546/21 549/5 550/6 550/8 550/14 552/15 553/4 560/19 568/15 569/24 572/22 573/4 575/5 577/14 577/14 577/15 580/4 582/15 583/25 599/17 606/5 640/12 647/17 661/10 668/16 669/5 671/8 683/2 697/21 708/12 709/6 710/3 720/24 okay [116] 512/1 514/11 533/24 537/7 539/23 541/2 542/13 543/13 543/17 545/22 547/24 550/1 551/1 551/25 553/4 554/7 554/14 555/12 555/14 556/13 559/1 559/6 560/1 560/19 560/22 563/19 564/5 564/10 564/19 567/16 567/20 569/5 569/15 569/19 571/7 571/7 571/13 574/2 574/5 575/8 575/13 576/25 577/14 578/23 579/19 581/4 583/12 585/5 589/9 591/4 591/15 596/9 596/14 597/4 597/9 597/12 597/18 598/23 599/9 599/11 601/20 602/5 607/6 607/8 611/12 624/13 625/11 625/13 625/21 628/14 630/12 631/4 631/13 635/19 636/7 637/1 640/22 642/5 647/2 658/5 660/7 668/16 672/22 674/2 677/23 684/19 688/6 689/20 690/17 692/17 693/16 694/1 694/22 694/25 695/18 695/22 699/17 700/16 701/24 706/7 722/20 725/23 727/22 730/8 730/16 731/20 734/3 736/7 737/2 742/8 746/23 750/15 752/15 753/18 754/14 755/23 old [17] 516/22 548/13 548/14 548/16 548/18 548/21 548/22 549/3 549/9 549/13 558/8 607/4 607/23 673/25 674/5 699/10 725/18 older [1] 515/21 On April 4th [1] 612/1 once [14] 509/22 545/7 555/4 563/17 580/4 583/20 584/10 584/14 586/5 590/15 595/13 635/5 720/16 733/13 one [151] 511/5 511/5 511/10 511/11 511/25 512/25 514/6 514/9 514/10 517/8 517/19 521/14 522/24 523/11 527/22 527/23 533/16 535/21 536/11 537/4 537/5 540/9 540/15 541/15 551/10 557/24 559/19 560/17 561/17 561/19 561/22 561/22 561/23 562/3 562/6 562/15 562/15 562/19 566/6 566/9 571/17 573/4 574/7 575/5 576/9 577/11 581/22 581/24 581/24 582/20 585/16 588/11 589/14 590/11 594/25 594/25 595/10 595/10 596/10 600/2 602/6 602/10 602/14 603/2 604/18 605/11 605/15 605/16 607/1 607/1 607/4 607/23 608/13 608/15 611/18 613/12 617/16 617/16 617/18 620/22 626/16 627/10 630/8 634/7 634/22 643/3 643/6 643/17 644/21 645/5 645/6 648/4 648/7 653/15 659/5 663/25 671/15 671/18 673/20 674/16 677/15 677/18 682/8 682/25 686/2 687/18 688/8 691/1 692/4 693/8 695/16 695/24 705/16 706/22 706/23 706/23 712/4 713/10 714/6 714/12 715/22 715/22 715/23 715/23 716/14 718/2 719/12 719/25 721/13 722/6 722/18 723/25 724/4 725/9 726/14 735/1 735/1 740/5 741/8 741/19 742/22 744/25 746/2 746/5 746/24 746/24 749/2 750/8 754/17 755/15 755/21
O o'clock [7] 537/16 593/3 617/16 617/16 648/11 690/9 690/13 oath [4] 649/19 661/11 661/16 702/14 object [4] 526/4 530/23 727/6 727/7 objected [4] 523/17 523/20 525/19 527/23 objecting [3] 518/6 716/8 716/10 objection [30] 511/20 512/3 514/14 517/18 525/6 528/17 528/20 529/12 536/5 563/3 599/20 628/19 629/1 630/7 632/12 633/16 638/14 641/20 641/23 716/5 716/7 719/18 721/14 724/24 727/21 728/11 733/3 734/12 735/4 747/2 objectionable [2] 530/23 530/24 objections [11] 525/8 525/23 525/24 525/24 526/8 526/24 527/16 527/24 528/23 529/14 646/15 objective [5] 561/10 561/10 562/4 620/11 627/21 objectively [1] 704/23 objectives [1] 620/9 obligation [2] 611/23 612/2 observations [1] 520/7 observe [2] 615/16 720/13 observed [3] 516/2 725/24 727/25 observing [2] 654/5 690/5 obtain [2] 736/14 747/6	

<p>O</p> <p>one-on-one [3] 594/25 595/10 746/24</p> <p>one-page [1] 571/17</p> <p>ones [9] 534/6 535/20 548/15 557/24 575/4 663/20 689/16 706/15 728/6</p> <p>ongoing [1] 719/8</p> <p>online [1] 753/11</p> <p>only [26] 518/4 530/11 539/20 591/13 596/10 600/15 606/25 607/4 613/13 639/2 644/5 646/2 651/5 674/2 676/18 676/20 684/25 686/14 706/23 714/25 717/3 741/19 744/20 748/24 752/18 755/10</p> <p>onset [1] 696/21</p> <p>oOo [1] 757/1</p> <p>open [15] 509/3 533/8 536/25 537/10 557/5 588/19 601/15 601/18 618/1 618/16 647/21 649/17 698/20 745/12 754/21</p> <p>opened [1] 540/9</p> <p>opening [6] 512/24 519/3 539/13 549/18 571/25 634/9</p> <p>openly [1] 627/22</p> <p>opinion [11] 520/5 733/6 735/18 736/15 736/18 737/4 738/10 739/17 739/19 752/15 753/15</p> <p>opinions [2] 732/21 740/1</p> <p>opportunity [5] 521/7 521/12 646/14 675/15 704/22</p> <p>opposed [3] 708/25 709/8 709/23</p> <p>opposing [1] 531/3</p> <p>option [1] 563/25</p> <p>options [2] 622/9 708/5</p> <p>order [24] 525/17 525/17 526/1 526/5 526/7 526/10 526/11 526/14 526/17 526/25 527/1 527/8 527/12 527/16 528/5 528/6 528/13 528/21 528/21 532/16 532/17 532/19 685/3 747/7</p> <p>orders [1] 528/1</p> <p>ordinary [2] 552/1 641/5</p> <p>OREGON [7] 506/2 506/6 509/16 510/4 510/23 712/6 732/12</p> <p>organization [5] 558/10 558/13 629/22 637/7 643/22</p> <p>organizational [1] 686/25</p> <p>organized [2] 537/5 724/2</p> <p>Orgren [2] 604/4 658/14</p> <p>oriented [2] 720/3 724/2</p> <p>original [2] 739/9 757/5</p> <p>Oswald [18] 507/3 514/13 517/17 528/16 529/8 532/4 537/18 618/19 619/9 629/2 643/7 643/15 643/19 644/1 644/5 646/17 684/21 685/7</p> <p>Oswald's [1] 512/3</p> <p>other [93] 510/20 510/23 511/10 511/11 513/14 514/3 515/5 516/1 516/2 516/11 518/8 519/14 519/18 522/11 523/13 525/6 526/7 526/13 551/3 559/22 563/25 563/25 564/23 574/3 574/18 577/7 577/10 580/20 581/25 582/2 582/2 586/9 586/13 600/19 600/22 603/7 609/17 610/1 610/5 611/15 614/16 617/18 620/3 622/3 627/16 639/25 640/5 641/9 642/16 643/17 644/16 645/8 646/8 649/9 655/1 657/5 658/14 659/3 679/19 681/20 684/17 686/12 686/17 687/22 699/21 705/12 707/12 708/5 714/6 715/5 717/7 719/6 719/9 720/20 723/17 723/21 725/11 726/17 726/20 726/22 730/14 732/2 732/7 735/23 740/5 741/16 741/25 742/1 742/4 748/8 749/3 751/1 751/3</p> <p>other's [1] 726/17</p> <p>others [3] 525/23 624/15 648/7</p> <p>otherwise [1] 533/12</p> <p>OTR [1] 675/14</p> <p>our [70] 511/20 519/24 521/10 521/10 525/5 525/8 525/9 526/1 526/19 527/3 527/5 527/19 528/1 529/14 536/5 539/1 539/1 539/1 540/6 552/21 556/14 557/15 557/23 563/18 566/6 566/12 566/21 567/17 572/14 573/17 574/17 575/1 575/18 575/19 597/21 612/21 617/14 621/18 622/2 630/19 631/2 633/5 634/19 634/25 635/1 635/2 636/8 646/4 649/5 659/6 659/22 665/2 665/5 665/25 666/14 666/14 666/16 670/19 685/2 685/3 685/4 690/8 699/7 700/7 704/20 710/18 717/24 723/22 725/11 754/15</p> <p>out [115] 510/16 510/18 513/17 513/19 522/17 524/19 525/22 529/22 529/23 529/25 530/6 531/7 532/7 532/10 540/11 540/19 540/20 541/5 541/8 541/14 541/20 542/2 542/3 542/7 542/10 542/11 542/16 543/5 543/6 543/8 543/14 543/21 544/1 544/21 549/15 552/1 555/3 560/12 561/24 563/11 563/13 563/20 566/14 567/11 570/5 571/4 574/8 574/10 578/15 580/12 581/11 583/20 585/7 592/15 595/24 601/10 604/22 604/23 613/5 623/1</p>	<p>624/20 624/25 629/7 629/9 629/15 629/19 634/6 639/3 639/5 639/11 639/11 641/5 642/15 645/13 645/17 647/3 647/20 647/23 653/2 654/9 654/22 657/8 662/12 665/25 667/8 667/10 667/14 667/17 667/24 674/13 674/22 675/2 686/15 686/20 687/3 687/6 701/22 703/12 707/13 709/12 710/18 715/23 716/10 720/19 721/11 723/16 724/19 728/8 734/16 748/22 749/14 749/18 750/10 750/12 751/23</p> <p>out-of-court [1] 734/16</p> <p>outcome [2] 639/9 704/8</p> <p>outlined [1] 620/16</p> <p>Outlook [3] 568/4 586/24 597/6</p> <p>outside [8] 575/18 627/7 646/15 657/2 680/17 680/21 685/4 701/22</p> <p>over [60] 526/20 535/1 536/15 540/1 540/14 540/17 540/20 540/21 540/24 541/4 542/22 542/22 543/10 543/17 544/14 544/19 544/25 545/1 546/16 546/19 547/1 547/7 548/25 553/17 558/22 559/12 560/18 566/19 572/3 572/21 573/3 578/13 579/1 581/20 582/3 590/7 593/20 598/1 598/17 601/21 606/6 606/6 608/3 649/3 649/8 651/16 654/1 655/14 668/20 671/12 671/19 672/4 689/17 701/12 710/21 716/17 730/6 741/9 752/10 755/16</p> <p>Overall [1] 621/13</p> <p>overlooks [1] 539/20</p> <p>overruled [5] 528/20 528/23 734/21 735/8 747/3</p> <p>overruling [23] 526/7 527/16 534/7 534/11 534/13 534/15 534/17 534/19 534/20 534/21 534/22 534/24 535/3 535/4 535/6 535/7 535/8 535/11 535/12 535/14 535/17 535/18 535/19</p> <p>oversee [1] 539/21</p> <p>overview [1] 664/14</p> <p>overwhelmed [1] 594/20</p> <p>own [10] 511/19 555/5 563/11 634/22 636/17 666/25 684/9 714/7 718/16 749/19</p>
	<p>P</p> <p>PA [1] 507/10</p> <p>pacing [1] 565/11</p> <p>package [11] 553/1 553/14 554/25 555/1 573/15 574/17 584/11 639/6 639/12 639/15 642/11</p> <p>page [39] 507/7 570/13 570/19 571/17 575/12 598/24 625/14 635/15 636/7 643/13 643/14 643/25 659/11 659/11 659/19 660/3 660/20 661/23 662/3 668/12 673/1 673/2 674/12 674/20 674/22 675/10 675/13 676/22 689/21 689/22 689/23 689/25 692/20 696/25 697/1 702/20 702/20 702/21 754/25</p> <p>page 3 [1] 702/20</p> <p>pages [3] 672/23 692/17 695/24</p> <p>paid [2] 731/14 731/20</p> <p>pain [1] 694/7</p> <p>Palo [1] 507/7</p> <p>panels [1] 677/12</p> <p>paper [3] 563/23 658/24 666/10</p> <p>paragraph [7] 564/21 575/16 576/1 625/21 626/9 629/21 693/7</p> <p>paragraphs [2] 564/4 564/5</p> <p>paraphrasing [1] 594/7</p> <p>parse [1] 510/18</p> <p>part [33] 524/15 524/15 525/7 538/23 538/23 544/17 551/22 582/3 601/7 616/14 631/11 631/12 632/16 633/22 634/19 639/22 640/23 641/8 644/4 644/5 657/25 660/4 660/24 670/14 684/15 699/22 700/15 706/5 706/6 713/24 721/7 736/19 737/10</p> <p>part-time [3] 601/7 713/24 736/19</p> <p>participate [3] 593/16 703/3 703/5</p> <p>participating [3] 540/16 592/24 725/17</p> <p>particular [3] 599/1 609/14 658/3</p> <p>particularly [1] 524/25</p> <p>parties [3] 532/7 532/10 566/7</p> <p>parties' [1] 535/23</p> <p>partner [2] 631/2 688/21</p> <p>partnered [1] 632/23</p> <p>partners [2] 666/17 703/1</p> <p>partway [1] 700/19</p> <p>pass [1] 533/4</p> <p>passed [1] 633/6</p> <p>passion [1] 708/19</p> <p>passionate [1] 538/10</p> <p>past [12] 549/12 549/14 582/21 590/19 590/22 590/24 596/15</p>

P	pharma/new pharma [1] 607/24
past... [5] 598/20 600/9 696/20 728/2 732/6	pharmaceutical [16] 539/12 601/1 612/17 619/15 666/6 720/2 736/11 736/15 736/17 736/22 736/25 738/9 738/11 738/16 747/22 748/20
Pat [13] 515/1 602/12 604/25 606/11 607/7 607/9 609/23 609/24 609/24 610/4 634/21 690/16 690/18	pharmaceuticals [2] 506/6 601/13
Pat Benatar [2] 515/1 602/12	pharmacy [4] 554/22 676/23 676/24 677/7
path [2] 591/13 708/18	Philadelphia [1] 507/10
paths [2] 597/21 708/24	phone [25] 539/23 541/1 545/13 545/20 546/14 551/7 551/14 553/13 557/10 557/12 557/13 557/16 557/17 560/6 560/15 573/2 574/2 574/3 582/7 589/12 590/1 596/23 688/12 723/21 741/9
patient [13] 552/21 552/22 552/23 557/5 558/1 572/14 572/16 573/12 573/14 635/20 670/19 685/3 696/13	phones [1] 618/13
patients [20] 539/4 552/12 556/12 556/20 557/21 558/19 570/1 571/14 573/19 574/14 574/21 575/17 621/10 636/2 670/5 670/9 685/4 692/2 692/4 692/8	photo [6] 602/17 603/7 603/9 603/12 603/17 603/21
pattern [1] 664/15	photos [2] 512/10 602/25
pause [2] 544/9 668/9	physical [3] 600/12 693/17 730/12
pay [14] 509/12 509/15 509/17 509/20 510/2 510/8 510/8 510/12 510/12 510/17 510/17 511/5 511/5 601/8	physician [4] 523/12 653/23 657/4 714/5
payroll [3] 741/25 742/4 742/5	physicians [4] 539/4 554/24 690/6 714/5
peep [2] 527/3 528/14	piano [2] 651/19 651/23
pending [1] 536/5	pick [1] 598/6
penetrating [1] 659/21	picture [3] 515/3 548/22 548/24
penning [1] 564/14	piece [2] 511/10 617/18
pens [1] 594/15	pieces [1] 586/17
people [35] 521/20 538/13 548/14 548/15 550/16 562/21 574/19 574/24 575/3 580/1 593/19 598/17 599/1 601/14 601/20 601/20 609/23 628/11 633/24 649/9 667/21 687/4 710/5 710/6 716/17 717/7 723/25 724/3 724/4 730/6 730/11 730/12 730/14 738/22 745/23	pinecones [1] 674/4
people's [2] 601/21 609/10	PIP [1] 635/2
per [4] 517/9 665/25 667/18 675/18	pit [1] 563/23
percent [54] 518/25 519/2 552/11 553/8 556/11 556/20 557/21 561/9 561/10 562/4 570/1 571/14 587/9 587/11 595/17 612/25 613/6 613/9 614/5 614/7 614/12 614/20 615/6 617/8 629/7 629/9 650/25 651/6 652/25 653/5 653/8 654/5 655/3 655/9 656/14 670/5 670/9 671/25 680/2 681/9 684/13 684/16 715/1 737/12 737/13 737/13 737/17 742/12 743/21 743/23 744/23 746/9 746/13 746/16	pitching [1] 687/8
percentage [4] 578/21 612/21 746/16 751/6	place [10] 559/12 567/17 573/9 624/6 629/13 643/13 668/19 677/9 688/23 704/15
perception [2] 627/6 627/7	placed [1] 676/14
perform [2] 592/14 736/6	plaintiff [13] 506/4 507/2 508/3 512/25 513/22 521/11 522/5 522/16 523/10 524/4 524/21 537/20 756/10
performance [60] 517/12 519/14 538/23 538/25 540/6 540/12 548/5 555/15 555/15 558/15 558/17 559/23 559/23 560/23 561/1 561/3 561/4 561/5 561/14 562/7 562/20 562/21 572/2 576/17 577/9 582/16 582/17 582/19 582/21 587/1 593/18 595/3 597/8 627/5 638/23 639/1 644/6 652/12 652/18 652/20 652/23 653/16 656/12 668/24 669/8 669/15 671/3 671/7 672/4 682/22 682/24 683/4 683/6 683/8 683/14 705/10 713/18 713/19 714/11 714/15	plaintiff's [37] 511/17 512/23 513/17 514/6 514/8 514/20 516/16 522/21 523/13 523/18 524/8 524/9 524/11 524/16 524/22 528/23 536/4 545/23 564/2 568/21 570/12 571/7 572/23 575/12 581/1 591/15 594/21 598/23 625/9 630/10 635/8 636/25 640/9 641/15 643/7 692/10 695/19
performance-wise [2] 576/17 713/18	plan [4] 516/25 533/23 539/2 562/7
performed [1] 562/22	planned [1] 567/18
performing [4] 538/12 538/14 656/9 682/19	planner [2] 724/2 731/12
Perhaps [1] 661/22	planning [3] 617/22 676/10 702/25
period [4] 515/12 616/15 641/10 650/9	plans [2] 586/18 721/2
periodic [2] 645/16 713/13	plant [1] 710/24
periods [1] 723/18	plate [1] 605/25
Permission [1] 642/3	platform [1] 718/18
person [45] 513/11 516/12 516/14 517/2 517/9 518/4 550/24 554/23 557/11 563/25 565/1 570/25 574/2 580/7 587/10 587/11 591/23 595/15 603/12 627/14 627/18 627/19 627/25 628/7 628/17 628/24 632/7 632/9 647/24 664/10 664/24 675/4 685/8 685/9 685/13 714/25 719/12 724/1 724/12 724/18 726/21 728/9 735/13 750/2 750/7	play [5] 510/21 606/7 699/7 699/13 714/9
personal [2] 520/6 651/20	played [1] 699/12
personality [1] 576/22	playing [4] 577/22 579/1 699/10 699/14
personally [3] 644/13 644/18 720/13	pleasant [3] 559/23 559/25 701/25
perspective [7] 620/3 625/24 627/2 627/10 638/11 638/11 688/23	please [52] 517/20 533/14 536/22 536/24 537/18 537/25 542/14 569/14 588/14 588/20 595/7 601/25 614/23 618/21 618/23 618/23 619/1 628/20 629/2 630/8 631/7 632/19 637/1 638/16 647/10 649/14 649/20 665/8 665/11 665/18 691/13 691/16 697/8 697/12 698/23 699/3 717/23 718/5 718/9 718/14 719/20 721/18 722/18 722/23 723/6 724/25 727/9 729/15 729/19 729/20 740/7 754/16
perspectives [1] 548/11	pleasure [1] 667/24
Peter [10] 545/23 546/1 564/21 570/18 571/8 571/20 573/22 576/9 592/11 599/15	point [37] 509/13 509/13 509/13 510/3 513/17 519/19 521/14 522/7 522/12 527/11 527/18 529/5 530/15 536/18 542/4 547/3 547/8 549/4 551/1 564/14 574/12 589/3 597/24 599/2 624/2 634/7 636/4 638/2 640/22 643/11 646/6 646/21 678/8 678/13 721/20 721/22 726/24
Ph.D [1] 554/22	pointed [1] 548/25
pharma [11] 607/5 607/5 607/24 607/24 619/20 620/2 620/3 623/15 623/16 623/19 631/15	points [6] 514/2 517/24 535/21 604/12 605/3 659/1
	policies [4] 601/19 621/20 660/17 666/15
	policy [18] 514/21 520/13 564/25 579/14 579/19 579/21 583/10 586/7 606/16 613/20 620/16 621/1 622/12 624/4 624/6 625/7 626/25 635/2
	polished [1] 580/18
	polite [2] 726/20 726/21
	political [1] 731/5
	Pomponi [8] 568/15 568/23 572/24 591/18 592/1 630/17 638/1 644/16
	poor [2] 516/24 657/3

P	556/24 557/2 557/25 584/23 584/24 600/6 600/15 652/11 670/17
poorly [1] 656/9	principles [2] 660/3 666/15
population [8] 552/21 557/5 558/1 572/15 573/13 573/14 736/19 723/10	prior [17] 521/16 522/20 523/18 528/1 528/5 530/12 540/3 582/15 589/15 596/9 609/3 692/11 707/16 707/19 716/8 733/11 746/14
portion [6] 551/11 551/13 551/17 643/20 669/17 695/19	prioritize [2] 682/17 682/24
portions [1] 551/10	priority [3] 595/4 595/6 683/3
Portland [3] 506/6 507/13 507/22	privacy [1] 515/2
position [15] 524/22 549/18 573/10 628/22 710/4 734/7 738/8 738/12 738/13 743/3 743/17 743/25 745/12 746/17 748/10	privately [1] 532/25
positions [24] 588/3 588/3 588/6 588/10 709/6 736/1 736/4 736/14 737/18 738/3 738/5 738/6 739/19 739/21 744/12 744/16 744/19 745/14 745/18 745/20 745/21 745/24 746/6 746/20	probability [1] 740/3
possibility [3] 624/21 743/3 743/9	probably [14] 553/19 565/25 570/16 574/25 575/7 579/22 669/2 680/24 699/16 700/15 700/25 701/9 719/13 755/2
possible [12] 617/21 633/14 679/14 695/13 738/13 742/13 743/5 743/11 743/24 751/6 753/15 753/17	problem [6] 517/23 522/5 556/22 648/20 659/22 755/13
possibly [1] 583/17	problems [4] 582/12 591/9 591/11 706/1
post [1] 731/4	procedural [1] 524/1
post-master's [1] 731/4	proceed [4] 532/4 548/10 625/1 644/8
potential [3] 626/10 630/25 740/23	proceeded [1] 552/20
potentially [2] 681/2 738/5	proceeding [4] 523/23 526/1 637/7 643/21
PowerPoint [1] 658/18	proceedings [2] 618/9 757/4
practicable [2] 510/2 510/22	process [10] 556/2 562/5 585/8 703/21 704/15 704/20 734/3 737/11 739/24 746/1
practice [6] 533/17 641/2 691/23 691/24 699/17 704/17	produced [1] 641/12
practices [9] 540/11 565/3 666/15 667/1 688/21 699/15 704/17 704/23 741/6	product [5] 552/13 575/1 624/5 658/6 660/14
practicing [1] 691/25	production [1] 631/1
pre [3] 532/11 676/10 702/25	products [11] 553/25 572/11 574/7 574/17 575/9 575/19 631/11 633/5 636/2 636/9 710/17
pre-call [1] 702/25	professional [9] 524/11 531/6 550/10 608/22 609/9 659/8 662/1 719/14 731/23
pre-planning [1] 676/10	professionals [8] 512/11 612/13 615/18 650/11 653/17 656/16 681/13 731/11
predate [1] 531/13	proffered [1] 509/21
predates [1] 530/1	profit [8] 557/4 557/5 557/6 558/6 558/7 558/12 558/24 558/25
prefer [3] 532/6 550/9 646/24	profits [11] 548/6 548/6 548/6 548/8 548/12 558/9 598/17 601/20 601/21 682/23 716/17
prefers [1] 532/4	program [11] 544/1 551/12 619/20 620/7 620/19 622/2 624/4 624/7 634/16 657/8 669/19
prejudice [2] 522/23 527/8	progress [3] 692/15 695/21 696/12
prejudicial [4] 524/10 529/3 529/4 529/17	prohibit [1] 636/17
preliminary [2] 536/9 691/1	project [2] 682/25 718/17
premature [1] 716/7	projects [2] 560/12 682/15
premium [1] 749/4	promise [1] 522/4
preparation [1] 555/20	promote [1] 624/5
prepare [2] 640/18 718/5	promoted [9] 580/22 708/9 708/13 709/15 710/3 743/17 743/20 745/2 748/3
prepared [2] 617/15 675/11	promotion [12] 514/23 515/16 556/7 629/17 709/22 710/1 710/4 710/9 743/13 744/9 744/24 745/4
preparing [3] 557/9 731/16 733/11	promotional [4] 571/3 571/4 586/17 660/18
prescription [2] 515/3 729/1	promotions [11] 584/21 708/25 709/5 709/7 709/9 709/11 709/13 709/18 709/20 745/21 746/2
present [18] 509/3 511/1 521/20 533/8 536/25 537/10 588/19 618/1 647/21 649/17 690/22 693/6 694/6 698/20 726/3 727/25 739/2 754/21	prompt [1] 588/15
presentation [9] 572/7 572/7 572/19 593/12 593/23 659/10 659/12 659/16 660/4	promptly [2] 588/17 617/16
presentations [1] 690/6	proposing [1] 648/19
presented [2] 690/20 713/14	protect [4] 621/8 621/10 621/12 622/18
presenting [3] 547/25 551/5 684/9	prove [2] 530/4 530/11
preserving [1] 514/8	provide [4] 529/15 665/11 665/18 689/22
president [7] 618/4 619/12 619/14 623/14 631/10 636/20 639/22	provided [9] 516/8 525/11 662/24 665/13 666/2 704/5 704/23 742/2 742/5
press [1] 668/7	provider [1] 662/7
presumably [1] 751/5	providers [2] 516/13 523/11
presume [1] 751/21	provides [2] 622/9 690/1
presumed [1] 746/21	providing [3] 511/17 662/20 666/17
pretext [8] 512/23 513/4 513/15 514/21 520/19 522/9 522/14 522/22	prudent [1] 703/16
pretrial [15] 523/18 525/21 525/22 526/4 526/25 527/13 527/23 527/24 529/10 532/20 533/10 533/12 535/22 646/13 646/16	PSS [2] 676/9 676/13
pretty [12] 553/6 561/7 561/11 566/4 567/7 574/24 576/18 585/14 588/17 635/3 689/5 710/24	PSSs [6] 593/11 658/21 666/5 666/9 710/4 714/17
prevent [5] 620/12 621/14 638/7 638/12 638/20	public [4] 576/4 741/1 752/2 752/2
prevention [10] 552/24 553/9 555/6 556/10 556/22 556/23 556/24 557/3 557/25 670/18	public's [1] 576/5
preview [2] 510/10 533/16	publicly [1] 753/11
previous [3] 532/19 629/20 732/14	publish [1] 642/3
previously [5] 515/9 588/2 701/24 732/18 737/19	Puerto [1] 567/2
primarily [3] 730/10 737/18 740/14	pull [4] 545/23 554/14 564/2 755/21
primary [16] 523/12 552/23 553/9 555/6 556/10 556/22 556/23	pure [1] 518/13
	purpose [2] 529/21 530/10

<p>P</p> <p>purposes [2] 617/22 648/12</p> <p>pursuant [2] 510/4 522/22</p> <p>pursue [1] 708/5</p> <p>push [3] 551/1 551/2 756/3</p> <p>put [30] 512/10 513/18 513/18 515/16 518/9 524/21 525/15 538/16 540/15 541/22 542/1 542/14 563/22 572/8 578/15 592/16 643/8 654/18 660/22 674/2 680/8 680/14 695/23 697/4 697/21 716/16 754/22 755/16 755/24 756/4</p> <p>putting [2] 573/10 683/20</p> <p>PX128 [7] 523/19 523/19 524/4 524/6 525/3 525/6 527/22</p>	<p>realized [1] 594/16</p> <p>realizing [1] 590/23</p> <p>really [43] 526/13 526/15 534/2 541/12 541/25 542/24 545/10 547/22 550/9 551/23 557/20 567/14 569/24 570/4 576/22 577/16 577/17 584/16 591/8 592/15 601/14 617/19 646/10 661/1 677/22 684/15 694/19 699/24 708/18 713/6 714/10 717/6 720/2 720/19 723/22 725/17 726/1 726/3 726/18 726/19 728/3 728/4 728/8</p> <p>reason [26] 518/2 518/6 520/17 521/25 523/8 528/1 529/12 529/24 529/25 530/7 539/16 539/20 544/10 544/16 547/8 547/21 598/8 601/12 608/2 627/8 627/8 630/22 630/24 638/22 654/4 748/4</p> <p>reasonable [1] 740/2</p> <p>reasonably [1] 749/17</p> <p>reasons [13] 519/24 522/6 529/18 530/24 602/7 621/5 624/18 624/22 626/13 639/1 641/17 659/5 753/20</p> <p>reasserting [1] 525/8</p> <p>reassuring [1] 567/15</p> <p>rebut [3] 513/25 515/17 522/14</p> <p>recall [29] 515/13 546/10 547/25 571/24 576/12 636/4 636/5 643/11 643/14 643/15 643/23 645/2 645/10 645/12 645/21 651/8 651/19 651/22 658/4 660/23 660/24 661/1 661/9 670/12 692/6 694/15 694/20 694/22 728/23</p> <p>recalling [1] 643/17</p> <p>recalls [2] 535/22 716/8</p> <p>receive [7] 571/9 583/15 626/18 657/22 739/20 739/21 741/7</p> <p>received [36] 513/10 515/20 525/19 528/3 533/10 533/10 533/11 542/21 542/23 561/21 561/21 584/10 603/21 611/2 611/23 612/1 613/3 614/17 618/8 637/15 641/24 646/12 651/10 651/13 657/19 658/1 660/5 676/3 685/21 688/1 703/23 740/15 741/20 743/13 754/3 754/23</p> <p>receiving [2] 658/4 704/2</p> <p>recent [2] 665/5 668/8</p> <p>Recently [1] 736/24</p> <p>recess [17] 533/3 533/7 588/13 588/15 588/17 588/18 617/14 617/15 617/24 647/14 649/15 649/16 698/16 698/19 754/16 756/17 756/18</p> <p>recognize [3] 625/15 640/11 640/13</p> <p>recognized [1] 618/6</p> <p>recollection [1] 661/21</p> <p>recommend [1] 667/20</p> <p>recommendation [9] 520/14 613/12 613/13 613/19 613/21 613/25 614/2 614/5 615/10</p> <p>reconnect [1] 720/20</p> <p>record [24] 523/1 524/16 525/22 526/9 526/24 532/22 533/18 538/1 584/22 619/2 626/7 641/19 646/14 654/10 691/17 692/18 695/8 698/24 718/10 722/24 729/20 754/22 755/3 757/4</p> <p>recorded [1] 704/12</p> <p>records [14] 523/19 654/9 654/18 694/1 695/3 695/8 697/24 730/22 730/22 741/25 742/1 742/4 742/4 755/1</p> <p>recover [1] 737/20</p> <p>recross [3] 716/22 717/1 754/1</p> <p>RECROSS-EXAMINATION [2] 717/1 754/1</p> <p>recruiter [1] 681/1</p> <p>ReD [1] 508/3</p> <p>redirect [6] 645/24 698/7 712/22 713/1 752/6 752/8</p> <p>reduce [1] 573/19</p> <p>reduced [2] 748/5 749/2</p> <p>reduces [1] 680/18</p> <p>reduction [3] 742/19 742/23 749/10</p> <p>redundancy [1] 522/25</p> <p>reestimate [1] 509/23</p> <p>reevaluate [1] 545/7</p> <p>refer [4] 655/25 710/2 751/7 754/4</p> <p>reference [6] 531/15 543/5 576/1 602/11 607/9 749/19</p> <p>referenced [3] 606/25 607/1 749/16</p> <p>references [3] 542/1 542/15 735/12</p> <p>referencing [3] 604/24 750/13 751/8</p> <p>referral [1] 737/1</p> <p>referred [5] 509/14 606/11 607/3 708/22 749/20</p> <p>referring [16] 546/2 549/11 549/13 560/3 573/21 598/13 626/11 628/3 628/10 629/15 637/23 642/12 645/6 645/11 695/6 753/7</p> <p>refers [1] 605/21</p>
<p>R</p> <p>racking [1] 566/5</p> <p>rah [6] 548/2 548/2 572/1 572/1 593/15 593/15</p> <p>rah-rah [3] 548/2 572/1 593/15</p> <p>raise [22] 511/13 511/25 523/25 524/17 525/3 525/9 527/5 528/7 537/23 583/6 598/20 599/4 618/23 621/25 622/1 622/6 623/6 637/12 672/25 691/13 722/21 729/16</p> <p>raised [9] 509/10 528/14 589/21 624/23 626/14 626/15 635/12 673/3 703/18</p> <p>raises [5] 524/1 524/20 665/9 665/18 672/24</p> <p>raising [5] 521/15 523/9 528/1 622/10 703/19</p> <p>range [1] 709/7</p> <p>ranking [2] 620/5 623/18</p> <p>rate [1] 731/23</p> <p>rated [1] 653/2</p> <p>rather [5] 530/7 608/23 714/18 714/19 745/21</p> <p>rating [3] 561/14 671/10 671/15</p> <p>rational [1] 544/14</p> <p>RDR [2] 507/21 757/9</p> <p>re [2] 661/6 688/22</p> <p>re-correct [1] 661/6</p> <p>reach [4] 674/13 674/22 675/2 687/3</p> <p>reached [6] 624/20 634/6 639/11 645/13 645/17 667/24</p> <p>reaching [6] 555/3 571/4 624/25 639/3 639/5 665/25</p> <p>reacted [1] 727/17</p> <p>reaction [11] 548/19 572/17 579/20 583/18 591/7 632/1 721/23 727/2 727/11 727/13 727/15</p> <p>read [25] 525/22 531/23 532/18 541/10 543/25 615/2 615/4 615/5 626/21 629/11 629/24 631/23 636/12 638/5 643/20 644/1 644/4 644/5 644/9 651/13 741/14 741/16 741/18 741/22 749/16</p> <p>reading [1] 658/3</p> <p>ready [9] 537/13 537/15 570/20 578/16 578/25 597/12 648/3 690/16 712/19</p> <p>real [5] 513/5 516/17 521/24 522/10 522/15</p> <p>realize [1] 703/13</p>	

R	
<p>reflect [3] 516/14 697/24 704/13</p> <p>reflected [1] 532/22</p> <p>reflects [2] 569/2 614/24</p> <p>refrain [2] 616/3 616/6</p> <p>regain [1] 738/25</p> <p>regard [1] 670/12</p> <p>regarding [5] 521/8 633/5 645/4 675/23 703/18</p> <p>Regeneron [1] 735/1</p> <p>region [14] 540/11 540/21 542/17 544/21 548/2 572/5 572/6 574/4 574/8 574/10 592/25 593/2 669/14 742/22</p> <p>region's [1] 703/15</p> <p>regional [21] 539/10 539/19 539/20 539/25 540/2 545/3 546/13 546/17 547/12 551/5 574/11 592/23 617/7 666/3 666/5 668/20 669/1 669/2 669/23 670/11 747/19</p> <p>registered [1] 594/1</p> <p>rehab [1] 733/1</p> <p>rehabilitation [8] 730/5 730/9 730/16 730/19 731/7 731/8 731/11 740/3</p> <p>reinforced [2] 629/14 629/15</p> <p>reinstatement [3] 509/20 510/2 510/22</p> <p>relate [1] 706/4</p> <p>related [10] 511/13 511/13 512/1 515/15 640/5 641/9 666/2 740/1 741/25 742/5</p> <p>relates [1] 519/10</p> <p>relating [1] 733/7</p> <p>relations [2] 637/2 638/1</p> <p>relationship [2] 519/17 726/21</p> <p>relationships [1] 635/25</p> <p>release [6] 639/10 639/15 639/18 642/13 647/2</p> <p>released [2] 646/5 647/1</p> <p>relevance [2] 520/10 529/15</p> <p>relevant [9] 518/23 521/4 522/22 524/10 524/16 529/17 639/24 641/16 704/4</p> <p>relied [11] 521/19 525/21 525/25 525/25 526/6 526/10 526/18 527/18 529/5 740/14 746/23</p> <p>rely [1] 735/7</p> <p>relying [3] 734/16 734/17 734/19</p> <p>remain [4] 527/15 618/16 659/5 746/5</p> <p>remained [3] 525/23 738/22 742/9</p> <p>remaining [4] 517/19 517/20 526/8 532/17</p> <p>remedy [1] 509/17</p> <p>remember [32] 509/10 545/16 548/7 560/14 573/25 577/4 579/6 589/24 597/7 599/7 606/6 649/19 657/21 660/6 660/8 661/10 682/13 684/23 688/16 689/4 694/18 701/10 704/2 710/21 711/16 711/23 724/16 724/17 724/20 724/21 741/19 750/18</p> <p>remembered [1] 658/2</p> <p>remind [1] 702/14</p> <p>reminder [2] 690/19 754/16</p> <p>reminding [1] 629/18</p> <p>reminds [1] 703/21</p> <p>remote [2] 710/12 710/23</p> <p>remote-based [1] 710/23</p> <p>remotely [1] 710/15</p> <p>remove [2] 702/15 718/6</p> <p>removed [1] 547/9</p> <p>renew [2] 519/24 529/12</p> <p>renewal [2] 512/3 528/17</p> <p>renewed [3] 522/21 529/9 532/8</p> <p>renewing [1] 525/5</p> <p>rep [10] 515/9 515/25 635/25 661/25 662/6 703/7 713/22 713/22 720/2 720/3</p> <p>repeat [8] 623/1 666/21 674/16 677/23 680/11 697/7 697/12 706/9</p> <p>rephrase [4] 599/25 600/2 628/20 721/18</p> <p>report [43] 575/8 575/10 575/13 576/5 580/23 586/10 586/13 598/7 606/16 606/19 606/22 610/22 616/21 620/5 621/1 622/19 634/17 635/11 635/17 636/5 653/18 663/16 663/23 664/1 731/16 733/11 739/6 739/9 739/10 739/11 739/13 739/14 741/13 741/18 741/23 743/2 743/7 743/8 743/14 744/7 744/24 749/16 749/25</p> <p>reported [13] 512/17 512/18 512/19 515/6 515/9 515/24 516/1</p>	<p>516/21 518/17 520/23 530/17 633/24 652/13</p> <p>reporter [5] 507/21 588/14 649/15 698/16 757/9</p> <p>reporting [3] 517/7 651/25 652/3</p> <p>reports [18] 517/4 519/11 577/21 579/25 592/16 616/1 616/5 616/10 616/11 629/11 629/11 634/23 636/18 654/22 704/12 704/13 739/8 741/14</p> <p>represent [1] 619/9</p> <p>representation [2] 532/20 621/8</p> <p>representations [1] 527/12</p> <p>representative [12] 549/18 612/17 633/14 653/22 653/25 654/1 656/19 661/3 713/24 713/24 738/9 738/11</p> <p>representatives [9] 515/23 542/10 547/21 586/12 593/2 629/9 654/24 662/22 676/25</p> <p>reprints [1] 629/12</p> <p>reps [30] 512/12 512/13 512/16 512/17 513/10 513/10 513/11 516/6 521/5 615/17 655/3 655/9 655/13 655/17 655/23 656/4 662/10 662/14 662/19 663/2 677/9 680/3 681/13 689/11 689/23 690/2 690/5 702/25 703/3 703/11</p> <p>Republic [4] 566/22 567/2 567/25 674/9</p> <p>request [7] 521/8 530/25 535/25 536/17 591/18 691/2 691/2</p> <p>requested [3] 532/5 649/15 698/16</p> <p>require [2] 519/15 617/21</p> <p>required [5] 587/8 595/17 606/15 664/21 714/25</p> <p>requirement [20] 513/2 513/2 513/5 513/23 513/24 516/17 517/10 520/14 521/3 522/10 522/13 522/16 526/16 580/11 613/22 613/23 615/14 615/16 680/1 715/8</p> <p>requirements [7] 512/20 514/18 515/7 515/11 520/20 588/25 744/11</p> <p>requires [1] 750/5</p> <p>reschedule [2] 754/19 755/5</p> <p>rescheduled [1] 651/21</p> <p>rescinded [1] 703/20</p> <p>research [10] 736/4 742/14 744/17 745/3 745/7 745/10 745/11 745/14 745/17 747/6</p> <p>researching [1] 511/8</p> <p>reserve [1] 535/25</p> <p>reserving [1] 535/1</p> <p>resolve [3] 531/18 647/16 714/9</p> <p>resolved [7] 511/11 511/16 511/21 569/16 577/22 646/3 646/4</p> <p>resources [16] 531/25 606/16 607/13 611/1 622/25 623/2 638/8 638/13 638/21 639/23 660/8 660/10 666/2 666/17 686/11 706/14</p> <p>respect [18] 520/10 520/25 523/25 524/4 524/17 524/19 525/3 527/21 528/5 532/3 535/24 536/1 655/12 655/17 702/18 707/5 711/5 717/15</p> <p>respectfully [4] 513/15 530/25 531/24 646/23</p> <p>respective [2] 665/8 704/13</p> <p>respiratory [7] 575/9 575/19 612/6 631/11 636/2 636/8 681/20</p> <p>respond [7] 517/21 530/14 579/13 604/17 648/3 667/23 675/15</p> <p>responded [5] 543/3 543/18 675/18 675/21 726/18</p> <p>responds [4] 578/7 581/12 665/24 668/9</p> <p>response [12] 520/2 529/1 559/1 571/10 579/3 579/8 604/21 630/2 630/5 632/2 645/21 704/21</p> <p>responses [1] 726/17</p> <p>responsibilities [3] 531/9 619/19 652/11</p> <p>responsibility [2] 621/17 652/15</p> <p>responsive [1] 514/20</p> <p>rest [8] 525/16 542/16 604/14 605/3 688/25 694/3 735/2 739/15</p> <p>restate [1] 633/22</p> <p>restraints [1] 676/14</p> <p>result [3] 518/21 575/21 636/11</p> <p>results [4] 590/5 599/3 637/11 703/25</p> <p>resume [2] 730/23 733/25</p> <p>retake [1] 647/10</p> <p>retaliate [1] 634/23</p> <p>retaliated [3] 592/3 601/16 703/19</p> <p>retaliation [9] 620/17 622/12 622/14 622/19 627/9 630/2 630/5 636/17 707/4</p> <p>retaliatory [10] 583/23 624/18 624/22 625/6 626/13 626/24 682/9 685/18 686/3 686/8</p> <p>retired [2] 742/10 743/10</p> <p>retirement [1] 509/13</p> <p>retrain [1] 586/9</p>

R	
return [4] 567/25 585/20 585/23 598/5	548/25 549/4 549/5 549/12 549/20 550/6 550/7 550/8 550/25
returned [3] 685/15 686/23 715/1	551/2 551/24 552/8 552/10 554/3 554/23 557/18 557/19 557/20
reunion [1] 725/7	557/24 558/2 558/5 558/6 559/2 559/3 559/4 559/7 559/7
review [26] 561/1 561/3 582/19 607/11 607/15 607/16 611/2	559/11 559/13 559/15 559/16 559/18 559/19 560/13 560/19
614/23 651/16 671/3 671/7 672/18 673/19 676/10 704/8 704/23	560/22 561/16 561/16 561/17 562/1 563/2 563/17 563/24
730/22 730/22 730/23 733/23 741/10 741/20 742/1 744/11	568/14 568/16 568/17 568/17 568/19 568/20 569/12 569/24
744/15 745/1	570/3 570/8 572/13 572/14 573/2 573/4 573/9 574/12 574/20
reviewed [11] 521/18 704/4 733/25 733/25 734/1 734/1 734/2	577/13 577/14 577/15 578/9 578/20 579/4 579/7 579/9 579/14
739/12 739/14 739/15 752/23	579/19 580/13 580/18 583/16 583/25 583/25 584/5 584/17
reviewing [2] 645/21 704/6	585/5 588/9 590/5 590/21 593/9 593/24 594/4 594/6 594/7
reviews [7] 547/20 582/16 582/17 582/21 656/12 677/8 741/20	594/9 594/13 595/20 597/21 598/4 599/24 608/11 608/17
ReX [1] 508/3	608/18 609/3 609/3 613/3 613/12 614/13 615/3 615/11 616/2
Rico [1] 567/2	616/7 631/23 633/2 649/3 656/1 662/9 667/12 667/16 667/16
ride [4] 598/18 677/16 677/19 677/25	667/16 668/19 668/20 669/4 669/12 670/8 670/9 670/10 670/16
rides [13] 650/14 676/15 676/18 677/10 677/14 678/3 678/5	671/17 673/10 673/10 673/13 673/13 673/22 674/2 678/16
678/9 678/13 678/15 678/25 679/5 680/3	679/3 686/10 686/17 687/12 687/15 689/22 695/5 701/1 707/21
Riechert [3] 507/6 715/14 756/8	711/6 711/14 711/20 711/21 712/8 712/16 713/15 714/8 719/22
right [309]	726/11 728/9 735/1 741/5 743/23 745/2 749/22 753/11
ring [1] 591/3	salaries [3] 747/6 747/14 747/18
ringing [2] 590/25 593/14	salary [8] 730/24 735/3 735/10 737/21 744/8 745/8 748/9
risk [2] 522/23 573/19	748/24
RMR [1] 757/9	sales [90] 512/11 512/11 512/12 512/13 512/14 512/15 512/15
Road [1] 507/7	512/17 513/9 513/10 513/11 515/9 515/22 515/24 516/5 517/3
Robert [1] 507/3	521/5 539/12 539/13 539/19 540/6 542/10 547/20 549/18 552/6
rock [3] 550/25 713/8 713/10	572/5 573/23 574/4 581/25 586/12 593/2 601/3 612/12 612/17
rocks [1] 605/15	629/8 629/22 631/12 633/14 635/25 637/21 644/23 644/24
role [19] 510/21 515/12 515/18 515/20 517/5 545/8 545/9 546/8	650/11 652/12 653/17 653/17 653/22 653/25 654/1 654/23
589/5 639/22 668/21 683/8 683/14 683/18 683/19 683/23 684/2	655/12 655/17 655/23 656/4 656/19 656/20 661/3 661/25 662/6
704/15 713/8	662/10 662/14 662/19 662/22 663/1 663/2 666/6 666/6 666/10
roles [2] 564/23 684/17	676/24 681/12 704/9 717/9 720/1 736/25 738/9 738/11 742/15
roll [2] 540/11 542/16	742/21 742/24 743/18 746/10 747/15 747/19 747/25 748/4
rolled [2] 544/1 657/8	748/10 748/14 748/19 749/1 749/5
rolling [2] 570/5 690/14	Salt [9] 560/10 650/24 655/13 655/17 655/23 656/5 711/4
room [4] 507/22 715/18 715/25 756/9	711/13 712/4
rough [3] 548/4 669/12 746/12	Salt Lake City [1] 656/5
route [1] 532/8	same [54] 512/19 513/8 514/18 514/18 514/19 516/3 517/5
routinely [3] 640/1 640/3 640/5	520/20 520/23 520/23 535/8 535/9 535/9 535/10 535/10 535/10
routing [2] 714/4 714/15	535/13 535/13 535/14 535/15 535/15 535/15 535/16 566/17
RTSs [1] 666/4	570/16 573/9 626/1 627/5 627/14 627/18 627/18 627/19 627/25
rub [1] 594/15	628/7 628/8 628/17 628/23 628/25 629/1 629/20 660/4 668/23
rubbing [1] 726/22	672/3 672/17 673/4 673/12 676/4 690/21 695/20 723/13 723/14
rule [21] 518/14 519/8 519/9 519/19 529/17 531/23 559/19	727/21 728/5 748/7
559/20 614/17 615/9 641/16 641/18 655/12 655/16 655/23	sand [1] 714/9
656/4 715/4 715/7 717/3 727/8 735/6	Sandy [1] 712/4
Rule 402 [1] 641/16	sat [1] 572/10
Rule 403 [2] 519/19 529/17	satisfaction [1] 595/9
Rule 404 [2] 518/14 727/8	satisfactory [1] 531/19
Rule 703 [1] 735/6	satisfy [1] 740/22
ruled [1] 529/5	Saturday [1] 618/5
rules [7] 513/8 515/2 516/4 526/17 624/7 634/22 636/17	saw [12] 520/7 520/8 521/18 539/4 544/10 661/3 694/10 699/20
ruling [28] 522/20 525/5 531/20 532/2 533/13 534/7 534/8	705/18 713/4 720/5 753/16
534/10 534/13 534/14 534/17 534/19 534/20 534/21 534/22	say [70] 510/15 513/14 514/5 517/11 521/6 526/17 527/6
534/23 535/3 535/4 535/5 535/7 535/8 535/11 535/16 535/18	530/22 531/15 540/18 541/16 552/9 556/8 558/21 559/1 560/15
535/19 536/3 646/16 646/20	570/20 578/5 579/3 579/8 580/15 587/21 588/8 590/4 590/10
rulings [2] 529/10 529/15	590/18 591/2 591/4 592/1 595/2 595/7 597/20 598/10 599/23
rumors [2] 717/10 717/11	599/24 608/22 609/15 610/4 613/23 621/3 627/20 627/22
run [1] 605/16	628/10 629/10 639/3 643/25 654/2 666/13 667/10 667/18 673/3
running [3] 542/4 597/24 755/22	673/13 674/14 674/23 675/1 675/21 677/6 677/7 678/14 678/23
rush [1] 573/4	679/1 679/7 679/9 689/1 689/9 700/21 710/6 711/24 721/6
RUSSO [1] 506/11	724/8
Ruud [5] 631/8 631/8 631/9 631/13 631/16	saying [39] 526/14 526/14 531/7 542/21 543/13 543/16 545/1
Ryan [2] 507/9 695/16	545/14 550/13 553/15 556/6 556/13 556/18 558/22 558/24
S	561/19 569/10 569/25 573/7 577/22 578/19 579/22 580/24
S-E-V-A-R-T [1] 729/21	581/12 582/22 592/7 594/6 596/13 628/6 650/20 650/23 666/22
safely [1] 693/9	667/14 670/2 694/15 698/4 700/22 713/25 725/6
safety [1] 629/17	says [59] 509/22 525/18 528/22 528/22 549/22 549/24 549/24
said [188] 519/3 523/1 523/5 526/17 526/21 531/11 541/3	550/3 561/23 564/22 571/13 571/14 573/18 578/6 581/10
541/13 541/17 541/18 541/22 541/25 542/2 542/21 542/24	591/18 595/2 599/2 604/21 605/15 606/5 611/19 612/5 612/11
543/1 543/3 543/24 544/9 544/15 544/19 544/25 545/2 545/10	612/21 614/19 614/23 615/21 615/25 616/5 631/7 637/6 637/10
546/3 546/8 546/15 546/16 546/18 546/19 546/21 547/1 547/4	638/2 640/20 642/8 643/20 650/1 653/15 659/20 660/16 660/19
	661/1 675/13 687/8 689/3 689/9 693/4 693/6 693/7 693/22
	694/6 694/13 696/8 696/8 697/2 710/3 716/24 754/23
	scared [1] 567/14

S	
scene [1] 539/8	separately [2] 627/4 654/11
schedule [4] 576/15 754/13 755/17 755/22	September [21] 546/10 546/15 547/10 617/4 651/25 663/8 663/13 663/16 663/21 663/23 664/4 664/5 664/18 668/15 668/19 669/5 669/6 669/9 705/7 713/14 757/8
scheduled [4] 597/5 618/10 638/3 755/7	September 2018 [6] 617/4 663/8 663/23 664/5 664/18 668/15
scheduling [5] 617/22 647/12 647/16 647/17 735/13	series [1] 624/14
school [1] 723/10	seriously [3] 569/11 584/1 632/20
Schwabe [1] 507/12	serve [1] 619/23
science [1] 731/5	served [1] 512/13
scientific [1] 554/21	service [1] 617/21
Scout [1] 723/2	session [1] 618/1
scope [1] 640/24	sessions [1] 699/17
Scott [10] 507/3 508/10 511/1 619/9 645/5 648/15 686/22 729/13 729/21 732/25	set [5] 539/8 551/12 626/17 629/23 631/5
Scott Severt [1] 511/1	sets [1] 626/15
screen [6] 625/12 648/11 692/12 692/21 693/10 695/23	setting [1] 550/10
scroll [10] 546/1 564/3 568/25 570/18 571/8 581/7 636/25 637/5 637/14 642/5	settle [1] 737/7
scrutiny [1] 595/5	Severt [15] 508/10 511/1 648/15 729/13 729/21 730/3 732/25 740/10 740/24 743/7 747/5 748/14 749/25 750/24 754/3
search [12] 733/8 734/2 734/6 734/10 736/3 737/10 737/15 739/15 739/24 752/16 752/20 754/4	seven [1] 596/10
seat [3] 537/2 537/8 702/13	seven-week [1] 596/10
seated [3] 649/14 649/19 729/19	several [9] 564/5 574/7 579/16 579/17 581/23 611/10 622/9 692/17 725/8
second [30] 511/12 518/13 543/7 566/10 567/4 567/7 567/8 571/13 574/12 575/17 576/1 595/2 599/2 603/8 614/21 652/13 658/25 674/12 685/8 685/9 685/13 688/6 705/14 705/15 705/16 718/3 722/18 737/15 740/5 741/14	severance [1] 584/11
section [7] 635/15 635/16 645/11 696/8 696/11 697/2 697/4	severe [4] 552/22 557/4 573/19 585/16
section you [1] 645/11	severity [1] 530/21
sections [1] 581/23	shape [1] 665/12
secure [1] 738/8	share [6] 558/16 597/16 635/23 665/6 665/7 685/3
security [2] 718/17 718/18	shared [1] 645/5
see [66] 517/2 526/12 529/11 531/3 531/4 531/17 531/18 538/19 538/21 541/10 544/16 553/14 553/19 555/5 555/11 567/3 567/5 567/8 567/9 567/9 570/11 571/1 576/4 577/24 580/12 580/16 580/21 584/14 584/19 584/25 587/23 606/24 611/18 618/13 621/3 634/21 637/3 637/4 640/12 643/9 643/10 645/18 651/17 661/25 662/6 664/8 665/3 674/20 676/11 684/19 684/25 684/25 686/19 688/19 692/21 693/12 694/8 696/8 699/15 699/17 700/16 719/1 720/13 723/15 744/14 756/9	shares [1] 621/17
see my [1] 567/9	sharing [1] 603/17
seeing [4] 538/11 564/12 643/23 723/21	sharp [1] 588/16
seek [2] 730/6 730/11	she [607]
seeker [1] 740/21	she's [2] 570/6 593/23
seeking [4] 622/9 624/19 704/22 730/15	shift [1] 743/12
seem [1] 688/12	shifted [1] 728/3
seemed [5] 702/2 720/16 720/22 725/4 725/13	shock [1] 599/17
seems [5] 552/13 561/19 713/6 724/6 725/2	shocked [7] 545/21 561/25 561/25 562/1 590/16 590/17 727/3
seen [13] 512/25 519/10 528/2 529/10 559/14 598/25 603/9 630/15 719/10 720/20 725/6 728/1 735/23	short [3] 522/5 648/5 648/6
Sees [1] 694/6	shorter [1] 739/10
select [1] 522/1	shortly [3] 551/8 585/11 602/22
selected [1] 746/5	Shot [4] 602/14 604/13 604/24 605/12
selection [1] 746/1	should [41] 518/14 518/20 521/10 529/18 541/4 541/14 541/20 542/2 542/3 543/4 543/6 543/8 543/20 548/10 558/1 559/24 579/9 580/7 608/19 612/21 612/25 614/8 614/20 622/14 625/12 634/19 644/22 646/25 649/8 660/7 666/24 677/19 679/5 690/20 692/12 692/20 697/21 702/12 702/21 748/19 750/7
selling [5] 517/14 544/3 654/7 675/23 675/24	shoulders [1] 735/2
send [21] 540/20 542/15 543/8 543/14 580/6 580/12 591/20 592/5 594/6 596/12 604/7 640/17 640/21 641/2 667/7 667/10 667/14 667/17 687/16 687/18 713/7	shouldn't [9] 544/18 557/23 559/18 574/9 601/16 616/6 677/15 677/24 680/1
sending [16] 541/4 541/14 541/20 542/2 542/3 542/7 542/10 543/5 543/6 543/21 544/21 570/24 596/10 605/8 609/13 688/16	shove [1] 756/3
sends [1] 594/7	show [9] 524/4 527/7 545/22 560/24 561/1 640/9 657/23 692/10 696/25
senior [2] 631/14 684/9	showed [5] 559/14 582/20 643/7 643/15 671/4
sense [4] 509/25 510/14 512/4 677/21	showing [1] 755/14
sensitive [1] 679/23	shown [4] 524/3 524/23 525/1 525/12
sent [47] 526/20 526/22 540/19 540/23 542/22 542/22 543/9 543/13 543/17 543/23 544/14 544/16 553/18 554/18 555/18 568/4 573/14 578/13 590/15 591/17 591/22 591/25 592/7 594/2 594/5 603/21 604/10 605/4 605/18 606/3 608/7 608/9 608/20 611/15 629/21 637/25 640/20 640/20 658/14 664/1 664/7 665/14 674/18 686/20 688/8 692/11 744/14	shows [2] 512/9 516/11
sentence [3] 541/9 563/22 575/17	shut [2] 728/3 728/7
sentences [4] 541/11 541/11 541/13 560/17	shy [1] 561/12
separate [3] 511/2 597/22 624/24	sic [2] 651/4 673/4
	sick [1] 555/21
	side [1] 574/18
	sidebars [1] 511/23
	sign [2] 533/25 605/17
	sign-off [1] 605/17
	signature [3] 757/6 757/6 757/6
	signed [4] 639/6 639/10 639/13 757/6
	significant [3] 513/24 630/23 631/22
	signing [2] 618/4 757/3
	silos [1] 714/7
	similar [6] 599/4 599/5 601/3 637/12 671/11 736/4
	similar-type [1] 601/3
	simple [1] 582/10
	simply [2] 521/23 646/21

S	speak-up [3] 621/18 622/2 634/19
simultaneously [3] 628/2 628/8 628/18	speaking [5] 635/7 694/20 731/14 733/23 744/20
since [12] 517/7 530/17 592/25 600/20 619/16 648/1 648/11 717/18 719/10 739/5 739/12 742/15	speaks [3] 541/2 541/16 553/5
sincere [1] 756/6	specialist [7] 523/14 523/20 612/13 666/5 666/6 694/7 694/10
singer [1] 602/11	specialists' [2] 539/12 539/13
single [1] 700/22	specific [5] 516/12 633/11 687/2 694/19 749/15
singled [3] 513/17 513/19 522/17	specifically [14] 516/7 516/9 524/17 525/6 528/16 571/14 589/2 616/19 643/18 655/5 692/6 720/2 743/16 744/15
sir [7] 527/20 628/20 729/14 729/16 734/17 735/8 754/10	specified [1] 717/5
sit [9] 564/15 699/21 700/19 701/1 701/3 701/6 701/9 720/18 731/7	speculate [1] 523/22
sits [1] 630/19	speculation [2] 524/9 633/16
sitting [8] 545/17 572/12 572/18 577/15 593/15 594/11 594/12 600/16	speed [2] 686/15 687/5
situation [4] 509/18 544/5 708/2 750/9	spell [1] 691/17
six [1] 719/3	spelling [6] 538/1 619/2 698/24 718/10 722/24 729/20
skill [3] 659/4 736/2 736/9	spend [15] 613/16 614/11 615/6 654/4 655/2 655/8 676/12 677/4 679/13 680/2 684/16 687/24 728/4 728/6 731/25
skills [5] 517/15 654/7 748/14 748/17 748/21	spending [2] 656/14 723/21
skin [2] 549/21 550/3	spent [2] 681/10 687/22
skip [1] 687/21	spirit [1] 566/16
skipping [1] 535/1	split [11] 516/17 559/16 581/21 581/22 587/7 614/24 675/23 676/1 676/6 715/7 715/12
sleep [5] 565/2 565/8 565/9 565/9 565/11	Spokane [13] 581/15 581/18 581/20 582/5 616/7 616/12 616/14 616/19 616/20 650/3 650/7 650/13 655/1
sleeping [1] 725/25	spoke [7] 521/19 540/13 541/15 568/16 656/15 688/22 704/7
slides [1] 684/9	sports [1] 700/8
slipped [1] 564/17	squeeze [1] 756/13
small [1] 511/12	squeezed [1] 755/14
smiley [1] 721/8	staff [1] 692/25
snippet [4] 541/9 541/9 573/14 573/18	stage [1] 684/10
so [469]	stand [8] 529/22 536/23 580/20 647/10 648/14 649/13 702/12 739/17
sobbing [2] 567/12 567/13	standard [4] 613/13 629/4 629/6 629/7
social [1] 723/9	standards [1] 621/22
society [1] 576/8	standing [2] 572/18 572/20
some [88] 509/13 511/17 512/10 529/25 531/22 533/12 539/12 540/20 541/5 541/19 542/1 543/16 551/3 553/17 555/8 555/11 556/5 556/6 556/13 556/18 557/19 559/22 559/22 560/10 561/2 561/7 566/14 571/3 571/12 574/25 577/12 577/13 578/6 580/21 581/10 582/11 582/12 588/2 588/24 589/3 596/8 597/16 598/4 600/14 602/3 603/20 603/23 608/2 615/24 624/2 630/20 634/6 634/10 645/3 645/7 645/8 645/17 648/4 648/5 656/11 657/23 667/20 668/18 674/4 679/19 687/12 694/20 697/5 697/13 707/12 710/23 713/3 713/4 713/17 713/24 715/15 717/10 718/24 721/20 721/22 726/24 741/22 746/15 746/16 751/4 751/21 753/3 753/15	stands [2] 533/13 688/20
somebody [7] 549/17 576/6 598/5 601/15 681/3 711/7 717/12	start [28] 512/2 512/8 537/12 544/22 555/8 556/14 556/25 557/1 560/23 564/22 567/12 573/13 578/19 600/24 602/3 602/6 657/24 665/2 680/16 680/22 694/5 697/21 700/12 702/21 710/4 720/1 754/19 755/5
somehow [3] 526/16 665/11 751/23	started [27] 509/5 527/22 548/5 548/13 548/20 549/15 551/21 552/1 552/22 562/19 563/20 563/23 572/11 618/3 651/25 652/3 652/9 662/12 680/20 696/7 698/1 705/3 705/6 707/5 717/15 724/19 748/2
someone [14] 568/2 591/10 627/6 633/2 634/8 641/3 645/1 703/25 727/4 736/2 748/10 750/16 753/12 753/18	starting [8] 548/3 567/5 575/6 575/16 580/21 584/20 721/16 755/18
someone's [1] 608/23	starts [1] 593/12
something [52] 521/4 521/25 531/14 531/18 542/12 543/9 544/21 549/12 550/7 552/24 552/25 553/11 553/19 553/21 562/7 563/22 564/23 565/13 567/1 572/14 576/4 578/13 579/6 587/18 591/12 595/6 596/10 597/8 598/14 601/13 621/3 621/3 627/11 632/22 634/8 647/15 671/11 674/7 676/24 677/2 688/13 711/8 711/25 713/13 714/1 714/5 725/16 725/22 727/18 738/25 749/11 749/18	state [16] 537/25 556/4 619/1 634/22 638/17 650/6 691/16 698/23 702/23 718/9 722/23 728/5 729/20 732/8 732/10 737/5
something that [1] 749/11	stated [20] 522/7 529/21 530/25 543/19 543/20 675/24 676/6 676/12 676/13 676/23 677/10 690/1 702/23 702/24 703/2 703/12 703/15 703/17 703/19 753/20
sometimes [9] 529/4 529/4 538/17 541/10 700/19 707/15 707/18 708/4 719/3	statement [11] 519/3 524/7 524/14 599/22 631/1 633/11 656/19 677/13 683/2 693/19 755/9
somewhat [2] 513/16 720/17	statements [11] 541/8 555/24 556/17 634/9 634/9 674/14 674/23 675/1 689/13 689/15 734/16
somewhere [3] 578/8 578/17 579/1	states [16] 506/1 506/12 507/21 544/22 619/21 620/1 620/19 623/15 623/16 624/1 634/16 658/21 704/4 751/14 751/14 753/8
sons [1] 699/10	stating [1] 620/24
soon [3] 567/1 569/12 584/2	statistic [1] 751/5
sorry [28] 533/9 582/16 600/3 612/20 620/24 623/1 632/16 638/18 663/18 674/16 678/11 678/17 680/6 689/24 694/3 695/5 695/6 697/11 706/8 706/9 708/10 708/12 708/15 711/25 712/1 713/7 718/25 734/23	statistics [6] 749/19 750/6 750/10 750/11 750/13 750/15
sort [7] 512/10 524/1 529/25 543/16 571/3 574/25 680/25	stature [1] 737/18
sounds [1] 756/10	status [7] 589/20 624/19 625/1 625/2 639/11 645/18 737/8
source [4] 556/18 584/24 631/24 665/13	statute [6] 509/17 509/19 510/5 510/23 576/3 751/17
sources [5] 541/5 541/6 541/19 557/23 735/20	statutes [1] 509/15
speak [10] 517/19 528/16 528/18 621/18 622/2 634/19 719/1 723/15 738/24 743/25	stay [8] 584/18 677/17 720/11 720/18 720/19 725/19 726/5 746/7
	stayed [3] 553/10 723/20 744/24
	stellar [1] 562/21
	step [13] 536/23 539/2 548/17 556/25 557/1 557/1 557/2 684/11 690/11 718/5 718/6 722/15 729/16
	Steph [8] 542/24 545/8 545/10 550/9 557/19 558/12 580/13 687/10
	Stephani [90] 518/4 518/19 522/9 522/11 539/11 539/18 539/24

S	<p>suggestions [2] 665/11 665/18</p> <p>suggests [3] 613/24 614/1 614/4</p> <p>suicidal [5] 574/21 574/22 575/2 575/3 575/5</p> <p>suicide [1] 576/7</p> <p>Suite [2] 507/4 507/12</p> <p>summarize [1] 616/6</p> <p>summarizing [1] 630/18</p> <p>summary [5] 569/2 569/7 637/2 675/11 688/18</p> <p>Sunday [6] 526/19 527/2 528/12 538/14 538/18 538/20</p> <p>super [1] 724/6</p> <p>supervised [1] 654/24</p> <p>supervisor [2] 520/23 627/16</p> <p>supervisors [1] 583/9</p> <p>support [1] 724/14</p> <p>supported [1] 748/18</p> <p>supports [1] 666/16</p> <p>supposed [13] 559/9 575/18 587/7 594/15 598/19 612/12 636/8 648/23 654/10 658/4 671/25 676/25 677/2</p> <p>sure [50] 523/7 526/22 539/2 539/5 544/2 544/7 544/20 544/23 553/21 566/19 571/1 571/2 571/5 573/15 596/2 605/3 605/17 613/23 617/3 619/3 635/14 636/16 643/11 643/17 645/6 646/23 658/2 667/1 667/4 667/6 687/8 689/4 690/13 694/4 694/17 717/14 722/19 722/25 723/3 723/8 724/17 725/5 726/1 731/5 735/3 743/19 751/18 753/2 755/20 755/25</p> <p>surfacey [2] 721/6 726/18</p> <p>surprised [6] 527/10 527/13 542/6 542/8 561/19 721/24</p> <p>surprising [2] 705/22 717/6</p> <p>suspected [2] 621/1 634/17</p> <p>suspicious [1] 753/22</p> <p>Sustained [7] 599/25 629/2 630/8 633/17 719/19 724/25 728/12</p> <p>SUZANNE [97] 506/3 508/4 531/7 537/20 538/2 542/15 544/9 588/23 598/25 599/2 601/10 605/7 605/14 605/16 609/3 619/9 624/18 624/22 625/2 625/23 625/25 626/3 626/11 627/4 627/19 628/2 628/8 628/25 630/2 630/5 633/19 634/1 634/2 634/5 634/6 635/4 635/19 635/25 636/14 636/23 637/3 637/7 637/10 637/24 638/3 638/8 638/13 638/21 639/6 639/10 639/12 639/18 642/8 643/21 644/2 644/8 644/10 644/14 645/4 650/1 665/24 668/9 678/15 678/24 686/23 687/2 687/9 692/4 692/6 699/6 699/8 699/16 699/20 699/23 718/19 719/11 720/6 721/12 721/20 723/11 723/12 723/15 723/16 723/24 723/25 724/16 724/18 725/3 725/4 725/6 726/20 726/24 727/3 727/19 727/19 728/1 753/12</p> <p>Suzanne's [12] 625/5 626/23 627/15 628/1 628/7 628/17 628/24 633/19 644/7 719/16 725/11 753/16</p> <p>Suzie [2] 718/24 719/10</p> <p>SW [2] 507/12 507/22</p> <p>swear [3] 618/21 690/25 698/21</p> <p>swiftly [1] 648/18</p> <p>switch [4] 642/20 675/6 695/13 705/1</p> <p>switched [1] 708/15</p> <p>sworn [12] 537/24 618/24 691/14 698/22 718/6 718/8 722/21 722/22 729/17 729/18 741/10 741/16</p> <p>SYMBICORT [3] 572/11 575/20 636/9</p> <p>symptoms [3] 600/12 705/6 706/10</p> <p>sync [1] 688/25</p> <p>system [5] 592/16 596/3 641/10 641/12 686/24</p> <p>systems [3] 586/21 687/13 718/18</p>
T	<p>table [1] 748/24</p> <p>tables [1] 511/2</p> <p>take [46] 509/6 531/4 531/8 533/25 536/23 543/1 543/25 546/16 546/19 547/1 554/4 555/13 569/5 569/10 571/20 573/22 582/14 584/1 587/18 588/15 588/16 589/12 590/7 591/14 592/11 596/21 625/9 630/10 632/20 636/7 642/2 643/19 647/12 647/19 649/23 665/8 668/20 684/8 694/14 698/17 738/8 743/2 743/6 750/7 754/15 756/8</p> <p>taken [9] 541/24 542/5 545/3 545/7 549/22 578/1 588/9 650/8 651/20</p> <p>takes [2] 724/3 724/13</p> <p>taking [3] 564/23 650/3 729/1</p> <p>Talcott [3] 507/11 752/5 752/25</p> <p>talk [66] 513/7 513/11 516/7 522/11 538/13 539/11 539/14</p>
Stephani... [83] 540/1 540/7 540/9 540/15 541/17 541/22 542/14 542/19 543/4 543/22 544/9 544/25 545/5 545/13 546/7 546/8 546/11 546/12 547/18 547/24 547/25 551/5 551/7 551/19 555/16 555/19 555/20 555/22 556/18 557/9 557/10 557/15 558/2 558/14 559/11 559/19 560/2 564/10 564/22 571/22 572/3 573/24 576/21 577/2 577/8 578/3 578/4 578/12 579/4 579/10 580/6 581/4 581/8 581/12 583/12 584/15 585/25 588/7 591/6 591/8 591/11 592/3 592/18 592/25 593/12 594/22 595/11 597/2 604/4 604/4 625/3 633/19 634/2 635/19 658/13 658/14 665/24 666/1 667/20 685/21 686/9 704/7 713/11	
Stephani DiNunzio [4] 518/4 539/24 625/3 634/2	
Stephani DiNunzio's [1] 518/19	
Stephani Orgren [1] 658/14	
Stephani's [3] 591/13 597/15 610/7	
Stickle [7] 512/12 515/24 516/21 517/4 517/10 519/16 519/25	
still [16] 562/23 566/23 586/2 587/8 588/3 591/21 615/6 649/7 656/14 668/5 683/17 683/22 737/19 739/17 754/24 756/5	
stipulation [5] 531/5 531/17 531/22 532/7 532/10	
stomach [3] 563/23 565/12 565/13	
stop [4] 550/12 562/12 563/15 659/8	
stopped [1] 714/2	
stopping [1] 563/15	
stops [4] 620/2 623/17 632/9 636/22	
story [1] 563/21	
strange [1] 701/20	
strategies [1] 540/5	
strategy [11] 539/1 547/22 548/9 552/2 552/8 552/10 553/7 553/18 658/8 659/6 660/14	
Street [2] 507/4 507/10	
stress [4] 585/15 693/10 694/18 694/21	
stressed [3] 569/13 702/2 705/23	
stressful [2] 705/13 706/3	
stretched [1] 677/10	
strictly [1] 583/2	
string [1] 545/24	
strongly [1] 667/9	
struggle [1] 740/21	
struggles [1] 656/11	
struggling [1] 713/18	
studies [4] 552/25 554/24 555/1 633/6	
stuff [16] 538/22 553/15 559/23 561/2 570/5 571/3 572/4 576/23 578/15 582/7 586/18 593/22 594/17 609/24 640/7 673/15	
stunned [3] 583/20 584/6 590/16	
subject [9] 512/19 513/8 515/8 516/3 520/20 535/23 536/5 591/18 647/12	
subjected [1] 606/15	
subjects [2] 705/1 740/2	
submit [2] 602/17 752/20	
submitted [5] 534/5 587/24 602/25 603/7 603/15	
submitting [1] 636/18	
subordinate [4] 514/16 583/10 608/20 609/6	
subordinates [7] 518/16 522/1 583/6 608/15 627/16 633/21 633/23	
subsequent [2] 515/12 752/13	
substance [1] 736/8	
substantiated [1] 633/3	
substantive [1] 524/1	
substitute [1] 509/20	
success [1] 736/24	
successful [2] 539/6 580/19	
such [3] 580/18 745/11 745/14	
sudden [3] 545/19 580/23 593/13	
Sue [3] 718/20 720/15 722/6	
Sue's [1] 720/11	
suffer [1] 737/25	
suffered [6] 530/5 530/11 530/16 530/19 531/11 532/11	
suffering [2] 517/12 705/10	
sufficient [2] 516/18 752/16	
suggest [2] 509/23 543/25	
suggested [5] 670/16 670/17 684/21 684/21 685/7	

T	territory [8]
talk... [59] 547/20 547/22 548/9 554/6 554/24 555/6 555/22 556/6 557/19 559/7 559/24 560/1 561/5 563/10 563/18 564/17 569/22 571/17 572/4 575/6 577/8 577/12 578/6 578/16 578/25 583/15 584/6 591/15 595/3 596/22 598/2 599/9 599/11 607/12 611/12 650/17 653/23 656/18 657/3 667/24 671/3 677/13 699/20 700/3 700/9 701/2 705/1 708/8 713/17 714/14 715/5 715/7 720/19 723/19 725/19 726/5 731/2 743/12 754/13	560/8 560/8 577/9 579/23 616/14 650/5 714/3 714/11
talked [68] 518/5 518/22 519/7 540/22 543/2 545/18 545/18 546/6 548/4 548/16 549/14 549/19 551/5 555/4 555/21 556/5 557/8 559/22 560/2 560/4 561/3 561/13 561/22 562/9 562/18 563/7 563/10 564/10 569/24 570/2 571/12 573/12 579/16 579/17 582/16 587/4 591/24 591/25 596/5 596/22 600/5 615/15 651/4 660/8 664/9 669/11 670/5 670/23 671/22 672/2 672/5 672/7 672/12 673/16 676/16 687/18 689/3 694/22 706/15 708/8 711/21 712/17 714/8 715/4 715/17 720/5 727/24 746/8	Terry [8] 544/15 545/25 546/3 570/13 570/25 571/2 591/23 592/5
talked' [1] 560/16	Terry Grey [1] 544/15
talking [53] 533/5 538/12 538/24 540/23 547/16 548/5 548/13 548/18 548/20 549/3 549/3 549/4 549/6 549/13 549/19 551/10 552/1 552/5 552/20 552/22 556/14 559/20 560/15 560/22 560/23 561/18 563/2 567/21 570/6 572/11 574/6 578/14 583/22 584/4 588/23 589/18 593/5 593/9 593/23 597/15 642/10 657/5 657/14 663/12 663/19 668/16 669/1 672/10 702/17 702/19 708/10 727/10 744/22	test [1] 731/13
talks [14] 519/13 540/8 541/21 551/18 552/10 557/14 578/3 590/2 590/8 597/18 612/8 703/3 703/11 726/2	test-based [1] 731/13
tardy [1] 537/12	testified [18] 518/4 518/11 519/4 618/24 663/6 670/9 670/20 672/3 691/14 705/3 728/22 732/2 732/5 732/6 732/9 732/12 732/18 750/24
targeted [1] 612/13	testify [12] 515/10 517/6 518/17 519/5 520/12 520/21 523/11 523/16 530/20 648/2 690/22 696/4
tasks [1] 595/21	testifying [5] 514/14 523/12 525/8 643/12 751/1
team [64] 538/12 538/12 538/24 543/10 552/11 552/15 553/18 555/25 560/8 562/13 563/12 570/4 573/9 579/15 580/18 582/8 592/17 594/18 595/3 602/16 602/18 603/3 603/18 605/8 606/3 609/17 613/6 613/16 614/8 619/24 626/19 630/19 631/2 631/12 634/8 652/13 652/15 653/2 653/16 654/6 654/16 654/20 656/9 657/9 657/10 657/11 657/12 658/14 659/3 665/6 666/3 683/5 683/9 683/14 684/13 684/15 687/10 688/25 699/14 705/10 713/18 713/18 714/19 714/20	testimony [25] 511/19 513/16 515/14 519/15 520/22 520/25 523/1 524/12 524/18 530/23 596/9 641/17 645/7 648/12 661/11 670/12 690/20 690/21 691/10 710/25 715/15 731/21 735/7 741/10 741/16
teaming [2] 713/20 713/21	text [31] 554/15 554/18 592/19 592/20 592/21 594/2 594/16 594/18 596/5 603/20 603/23 604/7 604/14 605/3 605/18 605/21 606/3 606/20 608/7 608/8 608/20 608/25 609/13 713/4 713/6 713/7 719/7 719/9 723/21 726/15 726/16
teams [3] 577/9 652/16 665/8	than [32] 510/23 522/6 522/11 562/22 564/23 578/17 596/15 608/23 612/25 613/5 615/10 622/2 650/24 652/25 655/1 661/18 661/21 679/19 684/12 694/19 701/23 702/3 721/16 725/4 726/20 736/16 737/18 738/22 741/25 745/21 746/17 750/20
tears [1] 565/12	thank [109] 509/9 511/8 511/16 512/5 514/4 517/16 520/1 521/13 522/18 522/19 523/5 525/13 525/14 527/20 528/10 529/19 536/7 536/21 537/17 537/19 537/21 538/3 550/1 555/12 569/5 569/12 571/20 573/22 576/9 581/3 582/14 588/21 592/11 596/21 599/15 601/23 601/24 608/19 617/13 617/23 618/18 618/20 619/1 619/9 641/20 642/16 642/18 642/22 645/24 647/4 647/7 647/8 647/9 649/18 687/8 690/11 690/18 691/4 691/11 691/16 691/19 694/14 695/11 696/3 697/15 698/6 698/11 698/15 698/17 698/23 702/5 702/7 702/15 704/25 712/23 716/21 717/21 717/25 718/4 718/9 722/8 722/9 722/12 722/15 722/20 722/23 726/9 728/13 728/15 728/16 729/6 729/8 729/9 729/11 729/16 729/19 729/22 733/2 733/4 740/6 740/7 752/5 753/24 754/7 754/10 754/20 756/8 756/12 756/15
teased [1] 701/14	Thanks [3] 643/4 665/25 667/23
tech [1] 736/23	that [1335]
teleconference [3] 551/11 594/5 669/21	that's [150] 510/25 511/3 513/7 513/24 515/5 519/14 521/9 526/12 526/16 527/23 528/20 529/3 530/8 530/10 530/13 531/6 536/13 539/14 539/20 540/4 540/21 541/24 543/15 544/23 545/12 545/15 546/9 547/4 547/8 547/10 547/21 548/16 550/8 550/16 551/6 552/2 552/3 557/6 557/6 557/7 557/17 558/9 560/19 560/20 561/18 569/19 573/20 574/23 575/1 577/15 577/16 577/24 579/22 582/11 585/8 585/18 585/18 587/22 591/25 597/14 598/24 601/21 604/7 605/3 605/12 607/23 612/6 613/2 615/3 615/25 622/3 624/2 626/5 626/6 629/6 629/18 631/22 632/2 637/19 637/22 639/14 639/20 640/18 642/12 642/14 643/7 644/1 648/19 649/9 653/10 653/20 653/22 658/22 659/25 660/4 660/16 660/19 662/9 664/16 665/14 665/19 666/5 666/11 667/4 667/17 668/10 672/12 677/7 679/18 680/16 680/20 681/19 682/2 683/19 685/12 688/21 689/3 692/15 695/3 695/7 695/8 696/3 697/22 710/2 710/5 710/6 716/19 720/7 721/7 725/12 726/9 726/10 735/4 736/5 738/25 740/13 740/16 741/19 744/2 744/10 747/9 747/13 747/17 747/21 748/23 749/25 751/13 752/1 753/11 755/3
telling [18] 542/10 547/3 553/6 563/12 567/13 575/4 583/24 609/6 611/23 612/2 626/6 659/19 666/18 666/19 667/7 678/2 678/5 680/24	their [40] 513/3 521/5 523/1 527/12 547/20 552/12 556/12 571/14 574/21 575/4 575/7 593/10 593/19 593/19 622/22 622/22 623/6 629/8 629/12 629/19 636/3 654/6 656/12 657/8 665/8 666/25 676/10 676/11 690/5 710/18 714/7 714/15 714/18 730/23 730/23 730/23 730/25 735/7 737/6 755/16
tells [6] 553/4 577/11 659/3 660/21 666/11 689/17	Theirs [1] 649/6
ten [3] 516/22 648/7 649/6	them [69] 514/10 515/8 517/25 518/17 521/8 521/8 523/3 527/18 529/10 532/18 541/5 541/19 541/23 542/1 542/15 542/16 542/22 542/22 556/24 558/20 562/23 563/25 567/23 569/3 570/2 574/24 581/24 582/9 582/13 583/7 601/14 603/2 631/18 631/20 634/12 634/13 640/21 654/6 656/12 656/15 662/12 665/8 666/20 667/17 676/10 677/5 677/5 684/17 685/25 686/1 686/2 709/15 710/12 714/10 714/12 714/13 714/14 714/15 720/15 730/4 738/7 741/22 744/13 750/10 751/12 755/16 756/1 756/1 756/7
tender [1] 732/24	
tenure [1] 738/23	
Teresa [13] 543/10 543/23 591/18 591/23 591/25 663/20 663/25 664/7 665/21 665/24 667/23 674/14 674/18	
Teresa Grey and [1] 591/18	
term [1] 723/17	
terminate [4] 518/1 520/17 625/25 644/25	
terminated [25] 513/22 597/23 598/8 598/22 600/5 600/19 626/13 637/19 638/25 644/22 712/13 716/19 721/12 721/20 722/2 726/25 727/4 736/12 742/9 749/21 750/1 750/2 750/3 750/7 753/8	
terminating [3] 637/7 643/21 644/8	
termination [27] 513/3 518/2 518/5 518/9 518/10 521/23 521/25 522/7 532/11 599/16 600/20 638/22 644/11 644/19 712/12 727/14 727/17 735/17 735/19 737/2 737/11 738/17 739/1 742/16 746/13 749/23 752/12	
terms [10] 548/10 561/5 576/15 600/12 601/3 704/20 721/5 727/25 728/1 730/19	
terrible [1] 527/8	
terribly [1] 525/16	

T	
themselves [1] 602/17	601/16 602/17 609/3 609/20 609/21 609/22 610/2 610/7 610/9 612/25 613/14 621/3 622/1 622/3 622/19 623/8 623/8 623/9 627/4 627/10 629/10 629/15 629/15 629/16 629/18 630/20 631/11 634/10 634/19 635/12 641/12 646/19 648/6 649/1 649/3 649/3 649/4 652/24 652/25 653/20 656/11 656/15 657/1 657/2 657/17 658/5 659/4 660/9 660/10 660/11 660/13 660/13 662/16 662/18 663/23 669/23 673/25 674/6 677/16 677/17 679/22 686/14 687/4 687/19 687/20 690/5 696/13 699/10 699/12 699/13 699/14 699/14 701/13 701/13 705/20 707/18 707/21 709/2 709/5 709/9 709/15 709/18 709/20 710/3 710/6 710/17 710/17 710/20 710/21 710/22 710/24 712/2 713/23 714/2 714/3 714/6 714/7 714/12 714/14 716/24 717/14 730/25 735/1 735/2 735/10 735/11 735/11 735/12 735/14 737/7 748/7 751/6 751/22 755/15 755/16
then [175] 509/24 509/25 509/25 510/3 510/9 510/9 510/12 510/14 510/17 510/20 510/21 510/21 511/1 511/2 511/4 511/5 525/16 526/6 527/1 527/16 531/8 531/13 531/18 531/21 531/23 532/25 533/17 536/11 540/1 541/16 541/21 541/23 542/13 542/15 542/18 544/8 545/18 546/7 548/4 548/9 548/12 548/21 549/1 550/3 552/1 552/8 552/20 553/10 553/11 554/7 555/14 557/18 557/24 558/5 559/22 560/23 561/9 561/11 561/16 562/18 565/25 566/20 567/25 572/2 572/3 572/10 572/11 572/22 574/9 575/1 576/1 578/2 578/7 580/25 581/15 581/22 582/1 584/21 585/20 590/8 590/18 593/1 593/11 593/18 594/9 594/15 595/7 596/5 603/7 604/4 604/12 604/14 604/17 604/21 604/24 605/2 605/6 605/11 605/12 605/14 605/15 605/18 606/3 608/25 611/19 612/8 612/20 614/23 626/17 628/5 631/1 646/5 646/22 648/14 648/15 648/17 648/23 652/9 654/11 660/17 660/21 661/21 665/20 665/24 666/13 667/6 667/18 667/20 667/23 669/6 671/12 671/17 672/20 673/22 674/8 674/22 676/10 676/16 680/13 687/4 687/8 688/14 693/22 700/19 702/19 703/4 703/12 703/21 709/16 711/18 712/8 712/10 712/12 712/18 713/13 713/14 713/15 713/22 714/21 715/4 715/14 715/22 715/22 719/6 726/16 726/24 730/12 735/14 737/15 750/1 752/13 753/3 755/8 756/4 756/10	they're [10] 520/6 520/14 574/24 590/23 635/18 667/4 709/6 709/7 714/15 749/7
therapeutic [1] 631/10	they've [1] 714/3
therapy [1] 723/9	thin [1] 677/11
there [188] 509/5 509/14 511/12 513/20 514/14 515/1 516/10 517/17 519/13 519/16 524/12 524/13 526/13 526/16 526/23 527/8 535/22 537/6 539/24 542/11 542/12 543/24 544/9 545/1 545/4 547/12 547/15 547/21 549/11 552/25 553/8 553/8 553/19 553/20 555/9 555/9 555/23 556/23 556/23 556/24 557/1 559/4 559/19 560/3 560/9 560/9 562/5 562/10 564/5 564/16 564/19 565/11 566/23 567/18 568/14 568/16 569/18 570/6 571/1 571/3 571/13 575/2 576/19 579/19 579/24 581/23 582/12 582/12 582/22 582/25 583/4 584/22 588/24 591/10 592/1 592/1 593/13 593/15 598/13 599/9 599/11 601/15 603/21 603/21 605/2 609/17 609/22 613/24 613/25 614/1 614/4 614/5 615/19 616/13 618/14 620/3 620/4 622/3 623/18 624/24 625/25 627/8 627/9 628/3 628/4 629/4 629/6 629/6 630/1 630/4 632/6 641/5 642/10 646/20 647/15 648/6 648/8 657/13 657/16 662/19 664/15 664/20 664/24 666/18 668/10 668/17 668/17 668/17 668/18 672/12 672/13 672/23 673/15 673/15 673/21 676/5 676/17 676/19 678/2 678/3 678/11 682/20 685/1 685/7 685/8 689/12 689/14 692/21 693/7 695/7 696/8 696/14 696/17 696/17 696/20 696/23 697/1 697/17 697/21 698/5 701/11 706/25 709/15 710/22 710/25 711/25 712/4 712/16 713/14 713/17 714/21 717/9 719/2 719/3 720/8 720/17 721/3 724/11 724/14 725/3 726/11 726/12 726/12 727/7 729/14 730/22 739/5 750/6	thing [17] 509/25 528/19 544/8 565/5 568/17 577/12 583/24 629/17 649/2 658/23 666/25 676/4 680/19 689/5 696/13 701/12 713/10
there's [3] 593/25 630/25 708/24	things [41] 512/25 514/7 515/15 538/21 548/2 548/11 555/5 556/13 557/19 563/11 564/14 564/25 565/9 567/18 586/14 591/21 592/18 593/20 598/4 598/16 598/18 626/1 629/12 642/14 643/17 647/16 651/23 660/22 662/17 662/18 670/2 673/10 682/8 685/16 686/15 687/5 705/12 706/13 710/19 737/25 751/17
thereafter [1] 585/11	think [139] 509/8 511/11 513/20 516/23 518/23 520/19 524/1 525/4 526/12 527/25 528/7 531/3 531/13 532/1 532/9 532/12 532/16 533/23 536/19 540/15 541/3 541/4 541/13 541/20 541/25 542/2 542/3 543/2 543/4 543/6 543/7 543/18 543/18 545/4 545/11 545/12 548/24 549/11 549/12 553/6 553/11 554/3 557/8 558/8 559/5 559/13 559/14 560/5 561/8 561/8 561/12 562/19 564/13 568/17 568/21 576/9 577/16 577/19 578/8 578/25 580/4 583/16 587/17 589/24 590/9 590/23 592/7 594/3 596/1 596/9 597/10 598/13 598/23 601/19 603/9 606/24 607/2 607/12 608/19 609/2 609/20 609/22 610/1 610/7 624/24 624/24 632/7 633/25 634/4 637/17 643/19 643/25 645/5 645/12 646/3 646/20 646/25 647/15 648/17 648/25 651/5 651/18 659/8 661/7 662/9 662/16 665/1 667/9 667/12 668/2 668/12 670/16 671/2 672/11 673/17 682/8 684/15 685/25 688/21 689/3 689/7 695/20 696/25 699/24 702/20 703/24 705/2 710/16 711/6 712/4 712/6 713/9 716/8 716/19 722/2 725/20 725/23 742/7 754/24
therefore [3] 510/24 614/13 704/18	thinking [27] 543/9 545/8 545/17 551/24 552/24 553/20 554/2 554/10 556/2 558/8 559/11 575/2 575/5 577/25 578/13 578/23 583/21 584/3 584/20 590/21 593/11 594/1 600/7 648/7 680/20 680/22 710/22
these [105] 510/15 510/17 512/7 512/10 513/7 513/13 513/25 514/2 514/7 514/12 517/24 518/8 518/11 520/5 520/21 520/24 521/5 521/6 521/10 521/12 521/20 522/21 525/20 526/20 526/24 527/2 527/14 530/18 540/10 541/4 541/4 541/6 541/7 541/13 541/14 541/19 541/20 541/24 541/25 542/2 542/3 542/6 542/7 542/10 542/11 542/16 542/22 542/25 543/5 543/6 543/8 543/14 543/14 543/21 546/6 554/15 555/24 556/10 556/17 557/25 568/22 578/12 579/4 580/14 580/20 592/18 598/16 606/20 615/20 634/5 635/10 636/15 636/18 641/2 641/8 641/9 645/13 657/7 660/20 663/16 663/19 666/19 666/23 667/3 667/7 667/14 674/14 674/23 684/17 685/8 689/16 692/25 693/2 694/1 707/12 707/15 709/12 711/15 730/12 732/14 740/1 740/19 744/12 746/20 750/15	thinks [1] 715/16
they [192] 513/9 518/11 518/12 520/7 520/7 520/8 520/9 520/16 521/12 521/17 521/18 521/19 521/19 522/8 522/12 524/4 525/2 526/5 526/9 526/15 526/25 527/5 527/11 527/15 528/4 529/11 529/22 529/23 529/23 529/24 529/24 531/12 531/13 538/12 538/13 540/20 541/8 541/14 541/23 542/9 544/22 554/17 562/22 567/13 568/4 569/9 569/9 569/12 569/12 569/15 569/15 571/12 571/17 575/4 575/6 575/6 579/7 580/18 583/13 583/15 583/16 583/16 583/24 583/25 584/5 584/19 585/7 585/10 587/20 587/22 591/11 592/24 593/5 593/8 593/9 593/10 593/18	third [12] 507/22 511/16 518/21 625/21 626/9 643/19 643/20 644/4 653/3 653/4 686/21 693/6
	this [435]
	Thomsen [14] 512/14 512/16 514/13 514/14 517/5 517/8 517/8 517/13 517/15 517/18 518/6 518/7 521/1 522/11
	Thomsen's [2] 519/13 519/16
	those [77] 511/3 511/4 512/4 514/1 515/3 515/17 516/3 516/15 519/24 523/11 525/8 525/24 526/8 527/16 527/17 529/18 532/21 532/22 535/20 536/1 538/9 574/21 580/12 580/12 588/3 588/6 590/25 591/3 598/14 616/24 620/22 635/14 637/22 644/23 646/12 648/9 648/13 650/13 650/15 652/18 661/16 663/24 685/22 687/19 689/13 689/19 693/14 693/24 694/5 697/5 697/13 697/17 708/25 709/10 710/11 712/5 713/7 717/4 724/4 725/9 732/8 736/14 737/17 737/17 739/21 741/23 742/4 744/19 745/17 745/20 745/24 746/2 746/6 750/9 751/4 751/21 755/10
	though [11] 574/9 594/14 609/9 611/10 627/25 654/23 663/15 673/7 673/10 675/4 707/24
	thought [50] 522/1 538/16 544/7 544/12 545/16 549/20 550/24 551/19 556/2 562/5 567/1 567/15 567/22 576/7 577/17 577/20 577/24 582/3 585/8 587/20 591/10 593/6 594/10 597/17 598/15 599/18 601/12 608/2 610/5 610/9 611/9 613/12 620/24 664/20 667/16 668/2 668/6 668/16 669/4 672/8 675/18 683/2 685/18 686/2 696/4 703/15 709/12 709/25 711/25 734/7
	thoughts [2] 544/14 564/1

T	totally [7] 545/7 553/1 560/7 569/17 578/17 584/4 590/17
threatened [1] 545/17	touch [7] 569/11 721/5 723/16 723/20 725/2 726/12 726/13
threatening [2] 564/24 590/24	touched [1] 725/23
three [18] 509/5 511/18 527/19 587/17 604/12 627/11 648/6 648/11 648/13 650/5 651/7 652/25 659/7 663/10 690/9 690/13 699/15 699/16	towards [9] 570/12 571/8 576/22 612/24 665/2 701/2 701/25 705/3 706/2
three o'clock [2] 648/11 690/13	track [2] 528/3 635/11
three-quarters [2] 527/19 651/7	tracking [1] 528/2
threshold [2] 512/21 514/1	train [4] 544/3 586/16 686/12 686/18
thrilled [1] 652/6	trained [5] 606/14 668/4 668/11 710/16 711/22
through [50] 509/13 525/2 527/18 528/25 542/4 547/16 551/6 551/18 552/9 555/5 567/16 572/9 590/25 593/24 594/18 597/24 599/17 604/14 607/13 622/4 624/3 629/11 629/11 635/10 641/12 641/12 644/24 646/6 653/2 653/3 653/4 664/2 664/17 668/12 673/1 676/2 680/5 686/1 686/1 687/4 687/21 689/19 700/20 717/9 717/9 723/18 723/20 734/3 737/1 744/20	trainer [4] 539/10 539/25 540/2 574/11
throughout [6] 519/1 574/4 580/1 584/18 700/9 701/2	trainers [3] 539/20 546/13 546/17
throw [1] 750/10	training [42] 540/5 542/11 543/24 544/1 544/5 577/23 586/15 657/19 657/23 657/25 658/4 659/12 659/14 659/16 660/4 660/24 660/25 661/1 666/5 667/21 668/1 668/3 668/10 668/13 668/14 668/18 668/21 669/1 669/2 708/16 708/18 708/20 708/22 708/23 710/4 710/19 715/1 730/24 733/21 735/22 743/18 744/18
Thursday [2] 528/14 648/24	transcript [2] 757/4 757/5
time [152] 513/21 514/8 514/19 515/7 515/12 517/7 519/23 529/14 530/16 530/19 531/12 540/14 540/16 543/7 543/7 546/12 549/15 551/12 554/19 563/22 566/2 566/9 566/11 566/18 572/3 573/24 577/4 578/23 582/4 582/8 585/21 587/18 589/19 592/12 593/3 594/20 595/5 595/5 595/10 595/18 596/1 596/10 596/14 601/6 601/7 608/15 611/19 613/6 613/9 614/12 614/24 615/7 616/15 617/8 617/11 625/24 626/1 627/5 627/18 628/8 628/25 629/8 629/10 632/6 640/17 640/18 641/10 647/4 648/24 649/5 650/9 650/25 651/6 654/5 654/9 654/10 654/11 654/18 655/3 655/9 661/18 663/15 663/17 663/19 663/24 668/23 669/2 669/7 672/4 673/25 674/11 674/13 674/16 676/21 677/4 677/10 678/8 678/11 678/23 679/4 680/2 681/9 684/3 684/7 684/8 684/13 684/16 687/22 687/24 689/2 694/25 698/11 700/5 701/10 703/13 705/9 705/13 705/23 711/9 713/4 713/22 713/22 713/23 713/24 715/18 719/7 719/9 720/5 720/16 721/3 723/18 723/21 723/23 725/4 725/10 725/10 728/5 728/7 729/10 731/14 731/16 731/18 731/20 736/19 736/21 736/21 738/24 739/4 750/5 750/16 750/19 755/6	transferable [2] 748/15 749/6
times [14] 536/1 566/6 579/16 579/17 580/1 581/13 609/22 641/7 650/2 732/5 732/6 733/13 733/13 733/14	transfers [1] 709/1
timing [4] 511/18 530/22 627/2 627/10	transition [1] 687/1
title [2] 597/7 597/11	transitioned [1] 730/13
titles [1] 736/4	travel [11] 560/9 560/10 582/6 587/21 677/15 677/19 677/21 677/24 679/23 703/16 704/13
to-dos [1] 595/8	traveled [1] 720/3
today [12] 513/20 531/21 594/5 606/8 618/4 618/16 619/10 661/18 661/21 672/3 692/11 731/18	traveling [3] 596/14 596/16 596/18
together [25] 532/7 540/15 547/19 572/8 577/24 594/15 597/17 641/7 683/20 699/7 699/11 699/13 701/2 714/4 714/14 718/20 718/21 719/2 719/7 723/22 725/9 725/10 728/6 728/7 756/16	treated [1] 530/20
told [76] 544/17 550/5 558/12 558/17 559/21 560/2 560/5 560/11 560/13 562/6 562/12 562/19 564/6 565/6 565/25 569/2 570/4 579/9 582/8 586/8 586/10 588/6 595/4 599/5 599/18 609/2 613/13 613/16 615/2 615/9 615/14 616/3 616/4 616/19 616/23 617/5 631/24 655/2 655/11 655/15 655/20 655/22 656/3 656/7 671/15 671/25 672/12 676/3 677/24 680/1 680/7 680/13 681/9 681/19 681/24 682/14 682/16 682/17 682/21 682/24 684/16 686/5 687/19 710/5 713/24 735/11 736/24 741/2 741/4 744/10 745/4 746/23 751/11 751/12 751/21 751/24	treatment [2] 524/15 573/18
tomorrow [11] 531/16 531/21 555/19 618/6 618/12 618/17 754/18 754/19 755/7 756/9 756/11	tree [4] 566/12 673/23 674/2 674/5
ton [1] 576/23	Tri [4] 650/3 650/4 650/5 650/13
tone [2] 544/12 584/15	Tri-Cities [4] 650/3 650/4 650/5 650/13
tonight [1] 755/22	trial [18] 506/10 509/13 509/14 511/23 519/18 523/11 523/15 523/16 523/24 524/8 524/13 528/8 529/16 536/2 536/13 536/19 618/12 649/8
too [10] 551/3 559/23 560/13 605/16 657/10 669/22 682/15 684/14 708/17 708/18	trials [4] 518/21 521/9 522/23 633/6
took [18] 532/16 547/4 567/1 567/11 573/18 581/20 582/3 589/5 647/22 668/19 669/4 669/6 675/1 682/5 682/10 684/2 684/6 728/10	tried [9] 560/17 563/10 566/14 595/6 606/21 610/24 662/16 736/22 736/23
top [9] 581/4 604/7 611/19 631/13 671/10 689/22 693/4 702/20 754/24	triggered [1] 631/22
topic [3] 559/4 635/13 687/2	triggers [1] 631/1
topics [2] 611/12 708/15	trimester [1] 561/8
total [7] 510/15 582/23 583/4 612/21 612/24 613/1 714/20	trimesters [1] 653/1
	trip [4] 720/8 720/14 721/4 726/10
	trips [2] 720/5 720/25
	troublemakers [2] 735/24 753/21
	Truax [3] 515/15 553/22 670/23
	true [14] 565/8 568/9 599/22 611/22 614/9 636/24 654/7 658/10 660/14 690/3 703/9 707/24 708/18 753/2
	truly [1] 533/12
	trust [4] 626/5 627/22 636/5 716/23
	trusting [1] 638/9
	truth [1] 659/21
	try [14] 560/14 565/9 567/16 567/19 582/9 643/8 662/18 695/23 696/2 701/6 719/2 719/4 756/13 756/16
	trying [25] 513/25 518/15 530/7 537/5 550/11 550/12 550/15 553/20 554/1 563/11 566/15 566/16 567/14 592/15 592/17 593/16 595/8 595/14 595/20 595/23 661/5 661/7 709/12 709/25 725/21
	Tuesday [2] 648/1 648/23
	Tums [2] 701/11 701/14
	turn [14] 516/25 565/10 572/20 603/20 603/23 610/14 614/15 615/20 624/12 625/14 647/23 674/11 692/20 733/6
	turned [5] 517/12 540/14 540/16 572/3 576/24
	turning [1] 580/24
	turns [1] 552/8
	two [50] 509/8 511/2 511/4 511/11 512/12 515/22 517/9 523/10 535/21 551/12 559/20 560/17 561/9 561/16 561/20 561/21 562/14 569/21 570/3 581/12 582/1 592/20 594/17 596/6 602/25 624/24 626/15 627/2 648/4 652/11 652/18 656/12 659/6 660/8 671/16 671/17 673/20 673/24 674/14 674/23 676/20 693/8 693/23 699/15 700/25 728/19 734/11 734/25 735/9 737/9
	type [7] 539/4 601/3 629/17 666/16 691/22 705/25 730/13
	types [10] 516/8 520/9 660/8 730/14 733/9 734/10 736/5 736/14 738/3 739/19

T	697/12 698/2 701/12 702/13 705/24 705/25 709/10 709/13 709/15 709/21 709/23 710/22 712/1 718/6 720/18 720/19 723/2 725/19 726/5 735/13 736/12 751/7 752/19 753/13 753/16 755/14
typical [6] 548/1 548/3 551/20 631/5 631/18 632/2	up-to-date [1] 687/2
typically [4] 726/4 737/6 740/19 745/24	update [3] 551/13 631/18 668/8
U	updated [1] 739/12
U.S [18] 543/11 543/12 619/15 619/23 620/4 620/6 623/19 624/4 624/5 624/6 624/7 630/18 631/11 634/16 635/2 640/8 750/16 751/5	updates [2] 645/16 686/24
Uh [10] 551/9 552/7 555/17 569/1 581/14 587/15 595/22 623/11 658/9 728/24	upholding [1] 704/19
Uh-huh [10] 551/9 552/7 555/17 569/1 581/14 587/15 595/22 623/11 658/9 728/24	upon [8] 525/21 525/25 525/25 526/6 526/10 526/18 527/18 529/5
ulcer [1] 565/12	upset [8] 562/25 563/6 563/9 673/17 673/20 673/21 701/15 714/2
ultimately [2] 585/1 600/22	us [33] 511/15 531/3 540/11 544/3 547/16 550/24 553/7 567/2 603/8 617/3 619/10 631/2 635/6 647/5 659/19 690/23 697/9 698/14 718/14 719/3 719/4 720/1 720/12 720/18 721/2 722/18 724/11 725/21 726/5 728/4 728/10 730/8 734/3
unable [1] 754/19	use [21] 542/11 550/4 569/14 608/22 609/10 612/12 616/4 616/10 620/14 623/25 630/25 661/3 661/25 662/6 666/1 667/19 723/2 730/25 749/13 750/11 750/13
unapproved [3] 620/14 622/20 630/25	used [13] 616/6 656/23 657/17 666/9 666/24 670/17 719/5 720/15 747/5 748/9 748/24 749/15 750/14
unaware [2] 659/24 688/24	useful [1] 598/18
unbranded [2] 571/12 571/17	uses [2] 616/1 622/20
uncomfortable [3] 557/20 573/10 712/20	using [7] 544/22 623/6 623/10 626/19 659/4 666/13 735/20
under [36] 509/16 509/19 517/12 517/13 517/15 518/14 522/23 523/23 529/12 529/17 531/9 561/13 561/17 612/22 620/25 621/18 624/5 636/3 641/16 641/18 649/19 659/23 661/11 661/16 671/17 693/17 694/6 696/11 696/17 696/19 696/20 702/14 727/8 735/6 750/3 751/16	usual [1] 644/2
under-appreciates [1] 659/23	usually [12] 517/2 538/18 560/15 562/6 580/2 580/15 594/18 699/24 700/2 720/11 721/2 725/18
undergraduate [1] 731/4	Utah [9] 603/2 616/23 712/5 720/11 725/11 746/5 746/7 750/17 750/20
underscore [1] 638/2	V
understand [26] 514/13 517/17 517/18 523/14 526/23 528/15 529/2 529/11 531/5 534/4 558/5 558/22 558/23 563/7 619/16 623/22 626/8 628/22 646/24 647/23 647/24 666/1 679/9 679/13 709/25 725/5	vacation [3] 566/21 567/17 674/8
understanding [13] 515/11 520/22 524/3 528/13 536/3 573/17 613/20 625/22 626/9 644/10 668/18 746/9 751/10	vaccine [3] 623/22 623/25 624/10
understands [1] 573/15	value [1] 532/17
understood [10] 523/4 532/13 533/2 603/17 606/17 613/17 615/16 616/9 690/2 746/15	variety [1] 515/14
undisputed [1] 530/15	various [1] 687/4
undue [1] 522/23	Veeva [1] 654/9
Uneasy [1] 693/21	verbally [1] 666/9
unemployed [2] 750/17 750/19	verdict [5] 509/24 510/1 510/9 510/14 511/4
unethical [4] 556/9 558/2 565/3 583/23	verify [7] 740/17 740/24 741/1 741/7 744/4 746/19 746/21
unethically [2] 635/20 685/2	versus [5] 582/25 675/24 676/12 704/11 728/2
unhappy [1] 693/21	very [88] 510/18 510/20 513/6 520/3 525/4 525/18 529/7 538/13 544/12 548/7 548/20 550/11 552/14 553/25 554/1 554/12 555/2 563/9 568/17 569/9 571/2 573/8 573/10 576/19 576/21 577/11 578/9 579/14 582/9 584/1 585/7 586/2 586/3 588/13 588/15 592/2 604/8 617/23 618/18 627/18 627/20 628/7 628/23 631/5 631/18 632/20 633/11 647/4 647/24 648/5 648/6 648/13 648/18 649/7 667/13 670/20 673/4 673/20 684/4 684/14 689/25 690/12 712/20 714/2 714/10 714/13 714/16 719/22 719/25 720/3 720/4 721/1 721/8 721/24 724/22 725/13 725/15 725/15 725/16 725/16 725/16 725/22 726/3 726/18 728/7 728/7 734/11 754/20
UNITED [9] 506/1 506/12 507/21 619/21 620/1 620/19 623/15 623/16 624/1	via [6] 560/6 618/24 624/20 677/9 688/17 691/14
United States [6] 619/21 620/1 620/19 623/15 623/16 624/1	vice [6] 619/12 619/14 623/14 631/10 636/20 639/22
university [1] 736/22	video [4] 606/5 617/17 618/24 691/14
unlawful [1] 620/12	view [5] 528/5 581/9 738/1 738/22 753/21
unless [3] 514/1 533/11 687/20	vindictive [1] 562/5
unlike [1] 515/8	violating [2] 565/4 717/8
unpleasant [1] 586/2	violation [3] 620/14 621/14 755/2
unsubstantiated [12] 589/25 590/12 590/14 590/23 590/25 598/12 598/15 598/20 599/8 626/17 626/18 627/4	violations [2] 621/1 634/17
until [22] 531/16 537/14 548/24 559/24 606/19 606/20 606/22 606/25 607/10 607/14 610/22 611/1 629/5 664/4 675/25 686/9 736/12 737/11 737/15 742/9 752/12 752/13	Virginia [2] 732/10 732/11
untrustworthy [3] 735/24 738/1 753/21	virtual [8] 516/18 519/1 582/25 650/14 650/15 667/25 689/23 702/24
up [128] 511/2 516/25 527/10 527/18 529/24 529/25 530/7 531/5 531/17 531/18 531/20 531/22 533/4 537/14 538/10 538/21 540/5 540/9 541/15 543/16 545/13 545/23 551/9 551/12 552/23 553/2 553/13 554/14 555/23 556/13 557/5 559/25 561/2 562/10 563/21 564/2 564/12 566/12 566/23 568/2 569/25 572/12 572/18 572/20 579/1 579/11 581/21 581/23 584/19 585/17 586/8 589/18 590/5 592/6 593/1 596/9 598/6 600/14 602/8 607/7 607/7 621/18 622/2 629/13 633/6 633/12 633/15 634/19 636/7 637/14 637/21 640/7 643/8 649/24 657/4 657/7 665/2 665/3 666/23 667/4 668/17 672/6 680/19 683/7 683/11 683/13 683/17 683/22 683/25 684/2 684/6 684/10 684/11 684/17 686/14 687/2 687/5 689/6 690/14 692/12 694/17 697/7	virtually [3] 703/3 703/5 703/6
	visit [13] 692/15 692/23 694/4 694/17 694/18 696/6 697/6 697/14 697/20 697/25 698/2 711/20 711/20
	vocational [9] 730/5 730/8 730/16 730/19 731/9 732/25 733/1 740/2 752/15
	voice [1] 545/14
	volatile [1] 592/2
	Volume [1] 506/10

W	
wage [3] 747/7 748/5 749/4	653/10 653/13 657/9 657/11 664/24 673/1 677/3 681/1 684/15
wages [1] 735/11	688/18 689/14 697/17 704/11 709/16 713/12 719/2 728/3 734/5
waited [2] 559/24 664/4	734/9 734/25 739/3 741/10 742/13 743/22 744/22 745/3 748/24
waiting [2] 576/6 648/2	751/17
waived [1] 526/23	went [46] 518/12 528/12 530/6 530/6 544/19 544/25 545/1
wake [3] 538/21 585/17 625/23	547/7 549/1 552/4 552/17 554/3 556/5 558/5 558/22 559/5
walk [5] 547/16 551/18 552/9 683/19 734/3	562/18 564/14 572/21 573/3 593/10 593/24 594/16 635/4
walks [1] 726/2	651/16 664/23 664/24 671/12 671/19 672/4 673/22 674/8 676/2
wall [1] 584/14	676/6 676/11 677/7 685/25 711/20 711/25 712/2 718/20 719/4
want [63] 511/25 512/22 521/2 524/18 532/24 534/4 544/15	719/6 720/21 726/6 755/16
545/22 546/16 550/16 550/19 550/25 554/14 555/24 557/4	were [286]
557/19 564/15 564/25 578/6 585/10 588/12 588/13 589/2 594/8	weren't [11] 542/9 565/8 586/23 598/14 629/19 656/14 669/7
594/8 594/13 596/2 596/22 609/16 623/20 624/12 625/14	701/13 705/20 713/23 714/6
626/10 628/22 630/10 635/4 635/16 639/21 640/9 642/2 643/11	whack [2] 581/11 703/13
648/5 649/1 649/4 649/10 661/23 674/17 678/24 679/13 679/16	what [318]
695/7 695/19 696/25 698/17 713/10 720/20 725/14 731/2 733/6	what's [13] 541/17 542/4 545/13 548/18 556/19 557/16 562/20
736/7 753/2 753/18 754/22	577/9 586/13 593/17 593/22 597/24 731/23
wanted [29] 512/7 521/11 525/9 526/22 528/6 540/11 540/20	whatever [9] 522/8 528/6 530/21 536/18 576/7 585/7 623/9
540/21 543/15 544/5 544/22 554/1 555/5 555/10 567/3 571/1	635/13 719/8
573/20 584/25 587/22 590/5 609/12 617/20 618/11 632/22	when [121] 515/7 517/1 527/4 540/25 541/10 544/10 544/25
643/6 694/4 724/19 735/10 752/10	547/4 547/25 548/18 549/13 551/24 552/14 556/2 556/25 557/5
wanting [2] 592/18 668/5	558/8 560/14 562/15 562/18 564/13 566/2 569/25 573/23 576/4
wants [6] 511/22 512/6 512/25 530/10 580/7 654/4	579/19 580/14 584/5 584/17 585/17 585/23 586/21 587/13
warning [31] 562/16 582/15 583/17 583/19 584/5 584/7 584/16	588/4 590/13 590/21 593/18 600/24 601/15 602/17 609/21
584/17 595/4 595/14 598/16 599/12 607/18 611/5 680/8 680/14	610/2 611/7 612/12 612/16 618/13 620/1 622/19 623/15 624/11
680/18 680/25 681/5 687/23 687/25 688/15 688/24 702/18	624/20 625/24 628/10 631/23 631/23 634/11 635/10 637/17
702/24 703/14 703/17 703/20 703/25 704/16 704/19	637/22 640/20 640/24 645/13 651/13 651/16 652/3 653/22
was [755]	654/9 654/11 654/19 661/11 669/12 671/2 672/7 672/12 673/11
Washington [2] 507/4 650/7	675/16 675/25 676/21 676/22 679/10 679/23 680/16 680/20
wasn't [45] 513/23 513/24 522/10 542/9 542/12 542/19 544/21	682/18 683/20 684/19 685/15 699/8 699/10 699/20 700/6
550/11 553/7 554/10 554/13 561/7 562/20 562/21 565/11	700/14 700/18 700/21 700/23 701/1 701/6 708/14 709/9 709/20
565/17 566/17 566/17 574/6 580/23 584/15 584/23 597/25	710/2 710/6 711/7 712/2 712/12 712/12 713/12 715/1 719/9
597/25 602/23 606/25 609/8 613/19 613/21 629/4 644/24	721/23 723/18 724/16 724/21 725/13 740/20 747/11 749/13
645/15 645/15 645/17 656/9 667/12 668/14 682/19 686/8	749/17 749/24 750/2 751/7
700/21 707/24 711/21 713/8 725/19 737/19	whenever [2] 536/19 724/15
waste [2] 519/22 679/24	where [44] 509/19 510/23 531/22 541/5 541/6 541/22 552/2
watch [3] 522/25 523/2 679/22	552/3 552/14 553/2 553/17 556/11 557/21 560/10 572/5 573/17
watched [2] 548/23 714/15	573/18 578/14 578/17 578/18 596/13 605/8 607/23 642/14
watching [5] 606/6 653/22 699/25 700/10 714/10	645/7 645/18 651/4 660/10 661/18 662/4 669/23 672/23 672/24
water [1] 713/14	676/3 693/6 694/13 696/8 710/20 711/1 711/10 712/2 714/15
way [29] 518/18 524/16 530/17 531/3 532/4 538/21 539/13	720/10 730/14
558/8 558/18 558/18 559/3 562/14 565/5 616/21 625/22 631/16	whether [16] 518/24 521/23 524/2 525/1 591/12 610/9 634/8
635/16 637/1 659/11 665/2 672/8 673/1 676/3 690/21 714/16	637/18 639/12 644/21 666/24 691/3 728/25 735/16 742/14
731/21 732/22 738/20 755/16	745/4
ways [3] 539/12 597/22 653/15	which [42] 509/19 511/12 514/9 514/20 516/13 516/23 517/12
we [544]	519/20 520/15 529/13 530/12 531/11 532/15 532/16 533/18
We'd [1] 657/4	536/4 568/21 581/1 603/8 604/9 609/2 610/15 618/6 645/3
we're [6] 529/20 540/7 558/24 577/12 584/1 584/4	646/20 648/10 650/6 659/7 675/10 680/2 684/22 687/23 688/20
we've [11] 531/22 567/17 579/25 580/19 597/21 600/17 600/17	689/17 701/11 726/20 731/10 731/12 734/3 746/21 752/17
688/20 715/4 715/17 755/21	753/8
weather [6] 657/2 657/3 657/3 657/4 657/5 657/14	which is [1] 726/20
website [2] 623/10 635/10	while [13] 562/25 594/2 661/2 661/7 681/17 686/15 686/25
Wednesday [1] 648/24	687/6 700/9 720/16 720/21 738/13 741/21
week [9] 553/19 566/24 577/7 577/10 596/10 699/15 699/16	whistleblower [17] 510/4 510/23 735/23 737/24 738/21 740/18
700/25 739/4	740/25 750/9 750/25 751/3 751/9 751/11 751/13 751/16 751/19
weekend [4] 725/7 725/13 726/6 726/23	753/1 754/5
weekends [2] 719/4 725/9	whistleblowers [6] 735/23 737/6 737/24 751/2 751/4 753/21
weeks [9] 583/21 584/3 592/20 594/17 596/6 665/7 675/25	whistleblowing [2] 518/3 753/9
750/17 750/20	whiteboard [1] 548/23
weird [3] 538/15 556/21 556/21	who [87] 510/10 511/1 512/13 512/15 512/16 512/18 512/18
Welch [6] 624/15 625/19 637/15 645/3 645/3 645/13	514/12 515/23 517/5 517/10 518/10 520/20 521/19 522/6
welcome [2] 619/11 643/5	523/11 523/13 524/8 529/13 539/3 539/3 539/4 539/25 540/8
well [105] 511/8 515/8 515/10 519/4 519/8 527/6 528/17 528/19	540/9 540/13 540/15 540/22 541/2 541/15 541/16 541/21
538/25 540/16 540/19 541/17 541/22 542/5 543/1 545/6 546/19	547/15 547/16 548/15 549/24 549/24 549/24 551/18 553/4
546/22 548/1 548/20 548/22 549/14 549/23 551/23 552/15	557/14 573/4 574/11 574/21 574/24 578/3 578/7 586/11 586/11
553/14 553/21 553/25 554/1 554/9 555/4 555/9 556/14 556/20	588/6 589/5 589/12 590/2 590/8 594/3 597/1 597/2 597/18
557/2 559/15 559/18 559/19 560/13 561/16 561/16 561/21	609/17 620/5 628/3 628/10 628/24 631/8 633/24 635/12 648/22
562/11 563/9 563/20 565/2 568/18 568/22 570/10 570/25	653/17 662/14 662/15 662/23 664/7 685/5 685/8 708/10 710/15
572/13 574/4 574/11 574/17 576/19 576/24 577/7 579/9 580/12	715/10 715/16 716/23 728/9 730/14 744/6 749/16 750/7 751/21
581/8 581/21 585/5 589/17 590/22 597/4 597/14 598/16 600/14	753/18 754/11
607/3 609/23 612/5 617/3 628/5 628/22 633/24 637/24 639/5	whoa [3] 544/11 546/18 552/3
	whole [28] 509/25 513/17 518/22 519/14 519/18 522/7 548/17
	555/10 565/15 573/16 579/10 579/11 585/8 586/13 601/12

<p>W</p> <p>whole... [13] 602/16 619/24 648/8 653/3 664/14 668/12 669/14 676/2 687/21 687/24 689/5 708/24 720/16</p> <p>why [52] 512/8 512/21 513/11 516/19 523/9 529/12 530/10 539/16 539/20 542/8 544/14 546/14 547/21 549/11 553/24 555/3 555/8 556/16 562/1 564/12 570/24 574/16 584/13 585/4 585/13 591/20 598/8 612/6 633/4 644/4 646/14 660/20 664/16 667/17 677/7 689/10 693/2 701/18 707/15 709/12 709/25 713/7 716/19 721/25 722/5 737/5 737/23 740/20 748/4 750/5 753/18 755/1</p> <p>widely [1] 635/3</p> <p>wiggle [1] 756/9</p> <p>will [111] 510/10 510/11 510/12 510/25 511/1 511/2 511/3 511/3 511/4 511/11 512/2 512/7 514/5 515/5 515/9 516/19 517/17 521/2 521/6 522/4 522/25 523/2 524/6 528/6 528/16 528/18 531/2 531/15 531/16 531/17 531/20 531/21 532/7 532/25 533/14 533/18 533/25 534/3 536/17 536/23 542/14 545/11 545/12 556/14 558/19 560/15 562/13 563/12 563/13 564/19 564/22 570/4 570/11 574/20 575/21 584/17 584/19 584/19 585/6 588/9 588/15 588/15 592/8 599/2 605/17 606/24 613/25 617/14 617/16 617/21 618/5 618/6 618/16 631/2 636/10 637/6 641/24 643/21 644/8 646/13 647/10 647/19 648/7 648/8 648/11 664/2 665/10 666/21 685/1 687/2 688/6 702/14 731/19 736/13 736/15 736/16 737/20 738/3 738/8 738/10 738/15 738/25 740/22 753/12 754/15 754/19 755/18 755/21 756/3 756/4 756/16</p> <p>Williamson [1] 507/12</p> <p>willing [6] 514/6 514/9 517/19 569/9 585/9 644/2</p> <p>win [7] 551/21 558/6 558/17 558/23 565/5 572/6 572/15</p> <p>window [1] 750/10</p> <p>wink [8] 575/19 575/19 636/1 636/1 636/8 636/8 670/17 670/17</p> <p>winning [2] 558/15 559/2</p> <p>wise [3] 576/17 576/17 713/18</p> <p>wishes [1] 519/20</p> <p>wishing [1] 521/20</p> <p>withdraw [1] 511/20</p> <p>withdrawn [3] 720/17 728/4 728/7</p> <p>withdrew [1] 527/24</p> <p>within [15] 546/22 560/10 564/24 580/22 623/18 637/19 640/8 640/24 644/17 650/5 666/8 670/10 677/17 739/21 740/2</p> <p>without [20] 524/25 543/16 559/8 565/4 575/3 575/4 578/21 579/5 582/7 612/9 612/16 612/22 612/23 650/18 650/21 650/24 671/23 676/8 749/19 757/5</p> <p>witness [52] 516/19 523/13 523/13 523/24 524/3 524/8 524/23 525/2 525/11 526/19 527/3 527/7 537/5 537/18 537/24 617/17 618/21 618/24 646/1 646/17 646/25 647/2 648/22 648/22 690/9 690/14 690/21 691/3 691/10 691/10 691/14 698/9 698/21 698/22 702/8 716/9 717/22 717/24 718/8 722/13 722/16 722/22 725/24 729/7 729/12 729/18 732/3 741/7 754/8 754/11 755/9 756/4</p> <p>witness's [1] 691/5</p> <p>witnesses [41] 508/3 511/18 512/2 512/4 512/7 512/9 512/22 513/13 513/18 513/25 514/2 514/7 514/13 517/25 518/8 518/10 519/5 520/5 520/20 520/24 521/6 521/10 521/12 522/6 522/21 526/1 527/5 648/5 648/5 648/7 648/18 649/2 649/5 649/10 687/22 712/1 741/17 755/14 755/18 755/21 755/24</p> <p>woman [1] 724/5</p> <p>won't [3] 531/20 564/5 618/15</p> <p>wonder [1] 543/8</p> <p>wonderful [3] 509/9 511/7 538/21</p> <p>wondering [1] 576/6</p> <p>word [7] 531/4 541/9 590/11 590/16 698/5 710/9 721/7</p> <p>wording [1] 721/8</p> <p>words [4] 590/25 591/3 598/14 678/24</p> <p>work [37] 521/5 532/7 538/6 563/11 576/14 576/15 579/23 585/6 588/25 641/6 644/3 646/5 665/2 684/14 686/23 694/16 694/18 694/19 694/21 700/3 720/3 723/10 730/6 730/6 730/14 730/23 734/9 736/10 736/15 736/17 738/5 748/22 749/14 749/18 750/4 750/12 756/16</p> <p>work-oriented [1] 720/3</p> <p>worked [10] 538/8 619/16 662/10 662/14 701/12 724/21 728/20 742/22 747/11 751/3</p>	<p>worker [1] 723/9</p> <p>workers [1] 722/6</p> <p>workers' [2] 730/11 732/7</p> <p>working [17] 537/14 560/12 575/21 586/12 606/6 617/19 629/8 636/10 640/24 669/20 684/12 710/15 710/20 714/4 722/7 736/19 748/6</p> <p>works [1] 531/19</p> <p>Worksheet [1] 657/25</p> <p>world [4] 593/6 593/11 593/16 750/4</p> <p>worried [3] 569/25 570/5 649/2</p> <p>worry [5] 546/20 570/8 570/9 570/11 686/1</p> <p>worse [3] 562/22 693/7 693/22</p> <p>worsening [1] 694/23</p> <p>worthy [1] 587/21</p> <p>would [214] 509/4 509/5 509/12 509/24 510/4 510/7 510/14 510/15 510/16 510/18 510/20 510/21 511/6 511/15 513/14 514/8 515/22 519/6 519/15 519/24 530/18 530/21 531/15 532/1 532/12 532/21 535/25 537/7 537/25 538/9 538/17 538/18 540/12 542/1 543/24 544/4 544/7 547/19 549/20 554/24 554/25 555/6 555/7 555/8 560/18 561/14 563/22 564/1 565/3 565/5 565/9 567/1 567/22 569/1 571/25 577/10 577/16 583/16 585/17 589/15 590/20 596/12 598/4 602/3 603/17 608/22 610/4 613/23 614/11 618/22 619/1 621/18 621/23 627/13 628/14 630/1 630/4 631/18 632/7 633/3 633/11 633/12 634/9 636/2 637/19 639/18 639/18 640/8 640/20 640/23 643/13 645/16 645/16 646/15 648/9 648/13 648/15 648/21 652/11 653/10 653/25 655/25 660/20 661/5 662/16 662/16 662/17 662/21 664/21 666/1 668/6 668/20 669/3 674/16 680/16 682/17 684/2 684/6 684/6 687/1 689/5 691/12 692/10 692/20 697/24 698/23 699/13 699/15 699/17 699/20 699/21 700/1 700/6 700/7 700/9 700/11 700/18 700/24 701/1 701/8 701/8 701/11 703/14 705/22 706/1 706/3 708/4 708/20 709/13 709/21 710/18 710/18 714/14 715/22 715/22 717/14 717/23 718/1 718/2 718/9 719/11 719/13 719/16 721/6 722/2 722/23 723/24 724/8 725/20 726/2 726/2 726/5 726/5 726/15 726/15 727/4 727/4 727/18 728/6 728/6 729/19 732/24 734/7 735/12 736/1 738/13 741/8 742/9 743/13 743/16 743/20 744/6 744/7 744/23 745/22 746/4 746/7 747/10 748/6 748/14 748/18 749/4 749/5 749/14 749/17 749/22 750/1 750/12 750/16 753/1 753/3 754/12 754/12 756/6</p> <p>wouldn't [18] 517/3 566/25 627/20 627/22 631/14 639/3 651/24 653/10 655/8 662/17 663/2 663/3 701/3 706/4 717/12 743/24 745/22 748/7</p> <p>wouldn't know [1] 663/2</p> <p>wow [4] 544/11 553/11 604/12 606/5</p> <p>wrinkles [12] 549/20 549/21 607/1 607/7 607/10 610/14 610/15 610/17 611/1 611/8 711/5 711/6</p> <p>write [11] 563/21 563/22 564/1 564/12 604/12 604/24 640/21 673/15 694/20 716/3 743/8</p> <p>write-up [1] 564/12</p> <p>writes [3] 605/6 675/16 686/23</p> <p>writing [4] 556/13 563/20 563/24 584/14</p> <p>written [30] 516/8 582/15 583/17 583/19 584/5 584/7 584/16 584/17 595/14 599/12 607/18 611/5 666/10 680/8 680/14 680/18 681/4 687/23 687/25 688/15 688/23 702/18 702/24 703/14 703/17 703/20 703/25 704/16 704/19 739/8</p> <p>wrong [6] 541/18 633/9 633/15 666/19 701/16 725/16</p> <p>wrote [10] 556/5 561/2 573/7 575/24 605/24 607/12 670/25 716/13 739/9 739/9</p> <p>Wyatt [1] 507/12</p>
	<p>Y</p> <p>yay [2] 593/14 593/14</p> <p>yeah [37] 539/25 548/12 551/16 565/7 569/21 569/24 579/17 582/8 582/22 585/25 586/16 599/7 634/11 640/7 641/4 645/11 661/10 669/5 671/1 671/8 677/22 680/23 685/25 689/7 699/21 700/11 700/13 701/5 701/8 701/11 702/2 706/18 707/8 713/5 716/20 727/18 752/2</p> <p>year [45] 516/24 518/16 522/2 534/3 545/6 547/19 547/20 547/23 548/4 558/7 558/11 560/5 561/7 562/1 562/22 566/6 572/6 579/10 579/11 600/25 611/24 612/3 617/5 618/5 651/7 653/7 653/13 669/13 674/3 675/18 702/3 702/4 705/14 705/16 717/6 719/6 719/6 723/13 724/17 724/20 733/15 743/19 744/8 745/8 747/22</p>

Y

year-and-a-half [2] 545/6 702/4

year-end [1] 547/20

years [40] 516/22 516/22 518/15 521/16 522/1 538/8 538/9
561/8 565/19 583/6 583/9 629/13 630/15 670/10 670/14 691/25
699/12 705/24 715/5 715/11 718/24 723/13 723/17 725/8 730/6
730/10 730/13 732/6 736/10 737/9 747/15 747/19 747/25 748/3
748/5 748/12 748/19 748/25 749/2 749/3

yes [466]

yesterday [7] 509/10 510/7 515/1 515/14 518/4 686/24 755/21

yet [5] 542/23 570/9 570/10 573/5 656/14

York [1] 732/11

you [1481]

you' [1] 580/16

you'd [2] 581/7 689/25

you'll [3] 582/11 611/18 665/3

you're [27] 540/23 556/4 556/11 559/9 562/3 562/25 563/6
566/8 567/20 570/20 585/24 600/6 612/11 619/11 628/23 632/9
636/20 640/24 643/5 667/1 669/1 671/17 672/10 686/10 723/19
726/21 753/7

you've [4] 561/23 725/2 728/1 751/24

young [1] 701/13

younger [6] 515/19 515/19 515/21 566/8 602/17 673/24

your [449]

Your Honor [64] 509/8 512/4 512/6 512/8 512/22 513/14 514/1
515/13 515/22 516/21 517/4 517/21 517/24 520/3 520/10
521/14 522/4 523/7 523/17 523/22 524/7 524/19 524/22 525/9
525/15 527/25 528/9 529/7 529/14 529/20 530/14 531/2 531/24
532/3 532/13 532/15 533/4 533/15 535/1 535/21 535/22 537/4
537/19 617/12 632/12 638/14 641/15 641/21 641/23 642/3
646/2 646/11 646/23 647/11 691/1 695/12 716/8 727/7 728/11
734/15 735/4 747/2 755/11 756/2

Your Honor's [1] 529/9

yourself [8] 603/2 611/13 645/2 682/25 699/4 718/15 723/6
730/3

Z

zoom [5] 643/10 688/13 688/13 710/17 710/18